Chapter 3: Implementing the CPD Outcome Performance Measurement System

In order to effectively implement the CPD Outcome Performance Measurement System, grantees need to integrate the components of the System into their local procedures. This chapter will highlight topics such as:

- 1) The key steps in implementing the CPD Outcome Performance Measurement System;
- 2) Integrating outcome measures into the Consolidated Plan, including the Strategic Plan and Action Plan;
- 3) Partner outreach and training; and
- 4) Data collection timing and tips.

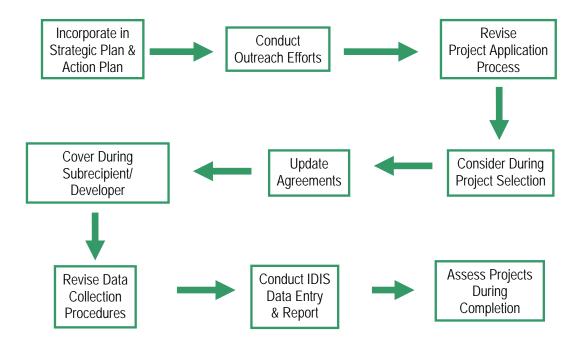
Key Steps in Implementing the Outcome Performance Measurement System

In order to implement the CPD Outcome Performance Measurement System, a grantee will need to consider how its local systems and procedures can ensure that the proper data is collected in a timely and complete manner.

- ☐ It is important that grantees act quickly to get the measures integrated. This is both because it is important to begin the process of "telling the story" about these key community development programs and because it is also important to "road test" the Federal, state, and local data systems and ensure that these systems will effectively collect outcome data and report on results.
 - Grantees are strongly encouraged to begin entering outcome data into IDIS during FY06.
 - ➤ Grantees are **required** to enter outcome data for all CDBG, HOME, HOPWA, and ESG activities beginning on October 1, 2006 (FY07).
 - This data entry requirement covers not only the selected objectives and outcomes, but also the indicator data for each activity. As noted in Chapter 2, grantees must enter **all** indicator data that is applicable to the chosen activity type. Grantees cannot elect to enter only partial indicator data. The IDIS screens will guide the grantee through this process, depending on the selected activity type and for CDBG, the matrix code and national objective.
- ☐ The required performance measurement data entry in FY07 will be timed to match the Phase I release of the updated IDIS System.
 - ➤ In FY07, grantees will need to enter outcome data on any open project, regardless of when it was set up in IDIS.

So, grantees should amend their data collection instruments and agreements with existing subrecipients, state recipients, developers, CHDOs, assisted businesses, and other key parties to ensure that the necessary data is gathered.

The integration of the CPD Outcome Performance Measurement System is likely to require the grantee to take a comprehensive look at all of its data collection tools and processes at each stage of the process for selecting and completing activities. The chart below highlights the typical stages of undertaking an activity and the areas where the performance measures will need to be integrated:



- ☐ During the consolidated planning process, the grantee will be required to list its intended outcomes and objectives in both the Strategic Plan and the Action Plan.
- ☐ Once the Consolidated Plan is updated, the grantee needs to <u>share the new requirements</u> and intended outcomes with key partners.
- ☐ The grantee then needs to <u>update its application</u> materials or process to either collect the proposed outcome data from the partner or to enable the grantee staff to have enough data so that it can make this determination.
- Once applications are received, the grantee needs to determine to what extent it will consider the proposed outcomes in its project selection process.
- □ After projects are selected and ready to begin, the grantee needs to ensure that its <u>funding agreement</u> with the partner includes language requiring that the outcome data be collected and reported.
- ☐ If the grantee conducts any <u>implementation training</u> for its subrecipients and other partners, the performance measurement system should be discussed.

	Once the project begins, the grantee needs to ensure that its partners have <u>effective data collection tools</u> that readily allow for the complete collection of the needed indicator data.
	Once the data is reported by the partner to the grantee, the grantee needs a process for including that data in its IDIS data entry procedures.
	Finally, the grantee needs to <u>report on its annual outcomes</u> as a part of its CAPER or PER. The grantee may also wish to use this data to conduct a self assessment of its program performance.
	llowing sections of this chapter provide additional information and suggestions on y topics identified above.
The	Consolidated Plan
summa compo and ide an Act	onsolidated Plan (Con Plan) serves as both an application for Federal funds and a ary of the activities planned by a given grantee. The Con Plan has two onents: (1) a complete Consolidated Plan that covers a three-to-five year period entifies the grantee's overall program goals (inclusive of a Strategic Plan), and (2) ion Plan which specifically indicates the activities planned by the grantee to occur following 12-month program year.
	The Con Plan is due no less than 45 days prior to the start of the grantee's program year. Due to the timing of the annual appropriation and the Federal fiscal year, HUD does not accept plans between August 15 and November 15.
	The grantee determines the exact timeframe for the Three to Five Year Consolidated Plan (also known as a Complete Consolidated Plan), including the Strategic Plan.
	The Action Plan is an annual and detailed description indicating which specific components of the Three to Five Year Consolidated Plan will be undertaken in the subsequent 12 month program year.
	For local grantees, the Action Plan is not focused on the source year of the funding, but rather on the specific activities a grantee intends to fund in the coming program year. For example, assume that a grantee has \$1,200,000 of CDBG funds in its line of credit and it will receive another \$800,000 in FY07. Of this \$2,000,000, the grantee plans to spend \$1,100,000 during FY07. The FY07 Annual Action Plan will cover all of the programs that will be undertaken in FY07 using the \$1,100,000.
	For state grantees, the Action Plan specifies a method of distributing funds, rather than focusing on annual activities. For example, the state's 2006 Action Plan describes how the state will distribute its 2006 funding (plus program income and reallocated funds). The state might not finish distributing those funds until after the 6/30/06 end of their 2006 program year, but it would still be included in the 2006 Method of Distribution. Any 2005 money that the state still has to distribute after 7/1/06 is still part of the 2005 program year Action Plan, not the 2006 Action Plan.

On February 9, 2006 and effective March 13, 2006, HUD published the *Consolidated Plan Revisions and Updates: Final Rule.* The new regulation may be found at: www.HUD.gov/offices/cpd/about/conplan/finalrule.pdf.

This Final Rule clarified a number of key Con Plan issues, perhaps most importantly how the CPD Outcome Performance Measurement System will be integrated into the Three to Five Year Consolidated Plan and the Annual Action Plan. A summary of key Con Plan changes includes the following additions to the Con Plan requirements (Note: this summary is not all inclusive and grantees must refer to the regulation for a complete explanation of the Con Plan changes):

Certain definitions were updated;
A suggestion for grantees to explore alternative public involvement techniques;
A requirement for consultation with agencies that offer fair housing services, as well as with faith-based organizations;
A requirement for an executive summary;
Requirements to state the rationale for funding allocation priorities and to summarize needs;
A requirement to indicate proposed accomplishments and outcomes by objective;
A requirement to indicate the outputs and outcomes for Neighborhood Revitalization Strategies;
A requirement to the homeless strategy to address the needs of the chronically homeless;
A requirement to indicate other resources that will be used to leverage the CPD funds;
A requirement to include a summary of annual objectives and outcome measures per the CPD Performance Measurement Notice;
A requirement to specify goals for the number of homeless, non-homeless, and special needs households to be provided affordable housing funds;
A section on actions to address the needs of public housing;
A HOPWA requirement to indicate the method of selecting sponsors and activities for TBRA and short-term assistance to prevent homelessness;
A certification on the grantee's policy on discharge of persons from publicly funded institutions.

As is clear from the list above, a significant number of the Consolidated Plan updates involved incorporating the CPD Outcome Performance Measurement System and other requirements for identifying specific program objectives. Since the Con Plan Final Rule was effective on March 13, 2006, so too were the performance measurement requirements related to the Con Plan.

- ☐ FY 2006, if a grantee is submitting only an Action Plan after March 13, 2006, the Action Plan must comply with the new Consolidated Plan regulations. Grantees that submitted Action Plans after March 13 have 90 days to amend their Action Plan to address new provisions of the Final Rule.
- ☐ For FY 2006, the Three to Five Year Plan must comply only if the grantee is submitting a Five Year Consolidated Plan after March 13, 2006.

Con Plan Due Date Summary

<u>FY06:</u> Any plan submitted after 3/13/06 must include outcomes.

<u>FY07</u>: All 3-5 Year Plans and all Action Plans must include outcomes.

- □ However, in FY07, the outcome measures must be incorporated in all plans. This includes the FY07 Action Plan and any new Three to Five Year Consolidated Plan. For any existing, open Three to Five Year Plan in FY07, the grantee must update that plan to include the performance measures. This is not deemed to be a substantial amendment unless new activities are added or there are other major changes in the grantee's programs.
- ☐ For FY08 and forward, all Strategic Plans and Annual Action Plans must incorporate the CPD outcomes measures.

Program Year Start Date	Consolidated Plan/Action Due Date	All plans required to include outcomes and objectives	CAPER/PER due date	CAPERs required to include objectives, outcomes and to compare results
July 1, 2005	May 15, 2005	NO	September 28, 2006	NO
January 1, 2006 February 1, 2006 March 1, 2006 April 1, 2006	November 15, 2005 December 15, 2005 January 15, 2006 February 15, 2006	NO- but amendment to existing 3-5 Year ConPlan must be done in FY 2007	April 1, 2007 May 1, 2007 May 29, 2007 June 29, 2007	YES
May 1, 2006 June 1, 2006 July 1, 2006 August 1, 2006 Sept. 1, 2006 Oct.1, 2006	March 15, 2006 April 15, 2006 May 15, 2006 June 15, 2006 July 15, 2006 August 15, 2006	YES -If objectives and outcomes are not included in annual plan or new consolidated plan submissions, grantees will have 90 days to amend such plans to include objectives and outcomes. Amendments to any to existing 3-5 Year ConPlans must be done in FY 2007	July 29, 2007 August 29, 2007 Sept, 28, 2007 Oct. 29, 2007 Nov. 29, 2007 Dec. 29, 2007	YES
All plans for FY2007		YES		YES

Overview of Outcome Measures in the Con Plan

There are two general ways in which the outcome performance measurement system is incorporated into the Con Plan. In both the Three to Five Year Plan and the Action Plan, the grantee is required to identify the overall CPD system objectives and outcomes it intends to achieve through all of its programs. Second, in the Action Plan, the grantee is required to identify the specific outcomes and performance indicators that will be achieved through each of its planned activities.

As noted above, the outcome measures must be incorporated into any plan submitted after March 13, 2006. If a grantee has submitted a plan after that date and did not include the outcome measures, the grantee has 90 days from the date of the plan submission to edit that plan with the outcome measures included.

Because these Con Plan changes will not typically constitute a substantial amendment, the grantee is not required to undergo the public comment process on these changes or to submit the edits to HUD, although they may wish to do so. The grantee should include a copy of these changes in its local files so that the information can be used by grantee staff when completing the FY07 CAPER and so that during on-site monitoring of the grantee, HUD can verify that the edits were made.

A grantee that needs to incorporate the outcome measures into an existing plan has two possible options:

The grantee can add text to its applicable existing program or project description
narrative and/or add a column to existing tables, listing the intended outcome and
objective of the planned activities and projects; or

The grantee can edit its narrative as applicable and re-do its tables using the <u>new</u> table templates provided by HUD.

Each of these options, as well as a summary of the new Con Plan instructions is provided below.

Options for Amending Existing Plans

One option for complying with the new outcome performance measurement requirement is to amend the grantee's existing plan to simply add the CPD system objectives, outcomes, and performance indicators. The grantee can add the outcomes, objectives and indicators to either the narrative and/or the existing Three to Five Year Plan and the Action Plan tables. The previous HUD templates for tables 1C, 2C, 3A, and 3C did not include the CPD Outcome Performance Measurement System. So, in order to incorporate the outcome measures, a column is inserted to collect the chosen objective and outcome for each planned activity.

Below is an example of the "old" version of the Three to Five Year Plan Table 1C with a column added (shaded) to incorporate outcome measures.

Table 1C
Summary of Specific Housing/Community Development Objectives

Obj # ▼	Specific Objectives	Sources of Funds	Performance Indicators	Expected Number	Actual Number	Outcome/ Objective*
	Homeless Objectives					
	Special Needs Objectives					
	Objectives					
	Other Objectives					

In this new column the grantee would indicate the CPD system objective (decent housing, suitable living environment, economic opportunities) and outcome (availability/ accessibility, affordability, sustainability).

In this existing column, the grantee can use local performance indicators but it is recommended to also use the applicable ones from the CPD system.

In this existing column, the grantee should assign a unique local number to each objective it has identified.

Similarly, below is a sample of "old" Three to Five Year Plan Table 2C with a new shaded column added at the right to incorporate the outcome measures.

Table 2C Summary of Specific Housing/Community Development Objectives

Obj #	Specific Objectives	Sources of Funds	Performance Indicators	Expected Number	Actual Number	Outcome/ Objective*
	Rental Owners					
	Owner Housing					
	Community Development					
	Infrastructure					
	Public Facilities					
	Public Services					
	Economic Development					
	Neighborhood Revitalization/Other					

Finally, below is a sample of "old" Table 3A from the Action Plan with a new shaded column added at the right to incorporate the outcome measures. For local grantees, similar amendments should be made to Table 3C, the listing of projects.

Table 3A Summary of Specific Annual Objectives

Obj #	Specific Objectives	Sources of Funds	Performance Indicators	Expected Number	Actual Number	Outcome/ Objective*
	Rental Owners					
	Owner Housing					
	Homeless Housing					
	Special Needs Housing					
	Community Development					
	Infrastructure					
	Public Facilities					
	Public Services					
	Economic Development					
	Neighborhood Revitalization/Other					

In identifying the outcome/objective, HUD has developed a numbering system that ties to the CPD Performance Measurement System. The outcome/objective numbers are as follows:

Availability/Accessibility	Affordability	Sustainability
DH-1	DH-2	DH-3
SL-1	SL-2	SL-3
EO-1	EO-2	EO-3
	DH-1 SL-1	DH-1 DH-2 SL-1 SL-2

Grantees are encouraged to use this numbering system throughout the Three to Five Year Consolidated Plan and the Action Plan when selecting and identifying intended outcomes and objectives (for example, the shaded column at the far right above).

The Revised Consolidated Plan Instructions and Forms

In order to assist grantees in implementing the March 2006 Con Plan regulations, HUD has published a notice with instructions and new sample tables. The local grantee guidance notice is dated May 2006. The state grantee guidance will be available during summer 2006. Grantees can access the guidance on the HUD website at:

http://www.hud.gov/offices/cpd/about/conplan/index.cfm#guidelines.

The revised Consolidated Plan template outlined in HUD's May 2006 instructions incorporates the performance measures throughout the Three to Five Year Consolidated Plan and the Annual Action Plan. What any individual grantee will need to submit may vary according to its local programs. There are common requirements across the four CPD formula grant programs (CDBG, HOME, ESG, HOPWA) and there are sections that are individual to each program type. The following sections indicate the required Con Plan Submissions – including text and suggested tables – by program type.

The Three to Five Year Consolidated Plan

to five	ted above, the Three to Five Year Consolidated Plan is intended to cover a three- -year period and set the agenda for the grantee's community development ies. Every Complete Three to Five Year Consolidated Plan, regardless of ee, must include:
	The time period for the plan: The grantee must indicate which years are covered by the plan;
	Priority needs analysis and strategies : The grantee must evaluate community development needs of various types (homeless housing, special needs, affordable housing, community development) and indicate how it intends to address those needs; and
	Specific objectives : The grantee must also indicate the intended results of its planned activities over the three- to five-year period.
Grante	ees will accomplish these tasks through both narrative and numeric information.
	HUD provides sample tables that are intended to assist the grantee in providing the needed information.
	The table formats are optional except for Homeless and Special Needs Populations Table 1A and Priority Housing Needs Table 2A which are required. If a grantee wishes to develop a local table that contains the same information but in a different format, it is free to do so.
this is	program types, grantees must submit certain specified narrative, including (Note: a summary of the requirements and grantees are encouraged to read the Con Final Rule for more details):
	Executive summary of the intended outcomes and an evaluation of past performance;
	The mission of the grantee and the timeframe for the Strategic Plan;
	The geographic areas of the jurisdiction where assistance will be directed;
	The basis for the geographic allocation of resources and for assigning priority to

☐ Identification of the lead agency and the Con Plan process and consultations;

Obstacles to meeting underserved needs;

needs:

		The citizen participation process;
		The institutional structure that will be used to carry out activities and the strengths and gaps in that system, including public housing;
		The standards and procedures for monitoring programs;
		The analysis of priority needs; and
		The number of units and actions in regard to lead-based paint.
eq	uire	llowing sections highlight the specific Three to Five Year Consolidated Plan ements that are additionally required for each activity type. As above, grantees couraged to review the details in the Final Rule and on the HUD website.
Но	mel	less Programs
nfc	rma	ntees – even those who do not have a Continuum of Care – are required to submitation about the needs and programs for homeless persons in their jurisdiction. quired narrative sections include:
		A description of the homeless needs (which can be described on Table 1A, see below);
		Priority homeless needs (which can be described in Table 1A);
		A summary of existing facilities to assist homeless persons (which can be described in Table 1A);
		Summary of the homeless strategy;
		The strategy for addressing chronic homelessness;
		The strategy to help prevent homelessness;
		The institutional structure which will carry out the homeless strategy; and
		HUD also suggests that the grantee develop a description of how it is implementing a discharge coordination policy.
		GG grants to states, the grantee needs to also describe how the allocation will be available to units of local government.
oro	gra	ition, there are several tables that grantees can use to describe their homeless ms. As noted above, these exact tables (except Table 1A and 2A) are not ed but the information must be submitted.
		Table 1A describes the needs of homeless and special needs populations.

Table 1A Homeless and Special Needs Populations

Continuum of Care: Housing Gap Analysis Chart

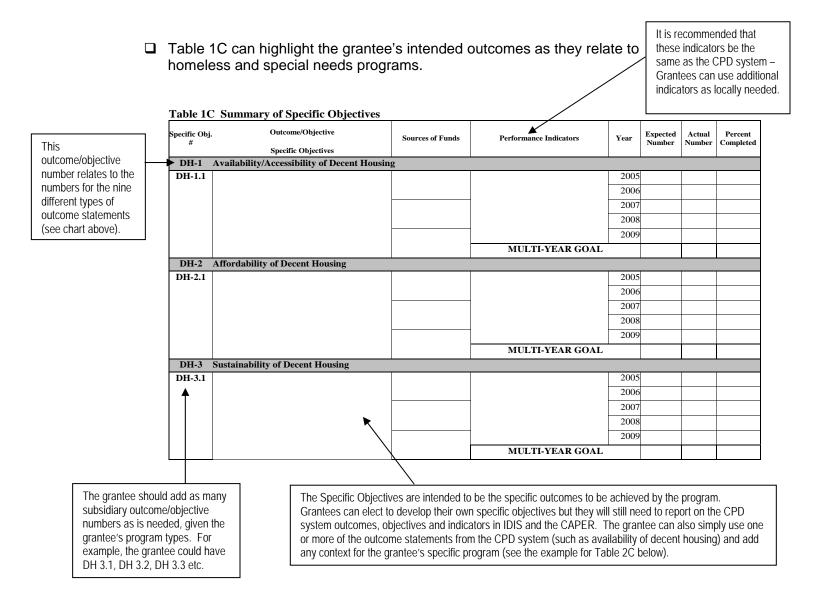
		Current Inventory	Under Development	Unmet Need/ Gap
	Total	ividuals		
	Indi	ividuais		
Example	Emergency Shelter	100	40	26
	Emergency Shelter			
Beds	Transitional Housing			
	Permanent Supportive Housing			
	Total			
	_			
	Per	sons in Families Wi	th Children	
	Emergency Shelter			
Beds	Transitional Housing			
	Permanent Supportive Housing			
	Total			

Continuum of Care: Homeless Population and Subpopulations Chart

Part 1: Homeless Population	Shel	tered	Unsheltered	Total
	Emergency	Transitional		
Number of Families with Children (Family Households):				
1. Number of Persons in Families with Children				
2. Number of Single Individuals and Persons in Households without children				
(Add Lines Numbered 1 & 2 Total Persons)				
Part 2: Homeless Subpopulations	Sheltered		Unsheltered	Total
a. Chronically Homeless				
b. Seriously Mentally Ill				
c. Chronic Substance Abuse				
d. Veterans				
e. Persons with HIV/AIDS				
f. Victims of Domestic Violence				
g. Unaccompanied Youth (Under 18)				

Optional Continuum of Care Homeless Housing Activity Chart:

		Fundamental Co	omponents in	CoC Syst	em - Hous	ing Invent	ory Chart					
EMERGENCY SHELTER												
Provider	Facility	HMIS	Geo	Target l	Population		Year-Round			04 All Bed		
Name	Name		Code	A	В	Family Units	Family Beds	Individual Beds	Year- Round	Seasonal	Overflov /Vouche	
Current Inventory			1	1					•	1		
											<u> </u>	
		+		1							+	
	<u> </u>	-		SUR	TOTAL						1	
Under Development				всв	IOIAL							
											<u> </u>	
				SHR	I ΓΟΤΑL						+	
TRANSITIONAL HOUSE	NC			SUB	IOIAL							
Provider	Facility	HMIS	Geo	Target 1	Population	2004	Year-Round	Unite/Rode	1 20	04 All Bed	c	
Trovider	Tucinty	11.113	Code	rurger		2004	Round	Cintis/Deas	1 20	O T THE DCG		
Name	Name			A	В	Family Units	Family Beds	Individual Beds	Total Beds	Seasonal	Overflow /Voucher	
Current Inventory				1		CIII	Deas	Deas				
,				T					1			
II I D I				SUB	ГОТАL					1	<u> </u>	
Under Development	T	T	т —	_			ı	1	ı		1	
		+										
	1		1	SUB	TOTAL							
PERMANENT SUPPORT	IVE HOUSING			•			•	•	•			
Provider	Facility	HMIS	Geo	Target l	Population	2004	Year-Round	Units/Beds	20	04 All Bed	s	
Name	Name		Code			Family	Family	Individual	Total Beds	Seasonal	Overflov	
				A	В	Units	Beds	Beds			/Vouche	
Current Inventory	1	<u> </u>							<u> </u>			
				+					1			
		+		+								
	1	-1	!	SUR	TOTAL				1			
Under Development												
									1			
				SUB	TOTAL							



Note that for the states, Housing, Homeless, and Special Needs Population Tables will be combined into a Table 1 for States. The soon-to-be-published State Consolidated Plan Guidelines will state that Table 1 and 2A are required for States.

Non-Homeless Special Needs

This sect	ion covers	the needs of	persons	with a rai	nge of spe	cial needs,	including
persons	with AIDS.	The grante	e must de	escribe:			

Priorities and specific objectives of the jurisdiction;
Resources available to be used to address identified needs;
Number of non-homeless special needs persons (can be Table 1B);
Priority housing and social service needs and basis for assigning priority;
Obstacles to meeting underserved needs;
Available facilities and services;
Use of HOME or other TBRA for non-homeless special needs;
Plan for addressing priority unmet needs;
Output goals;
Target dates for housing facilities;
Explanation of geographic allocation of assistance;
Role of the lead jurisdiction to develop an area-wide strategy;
Certifications; and
Specific HOPWA objectives (grantees can use Table 1C)

As noted above, for special needs non-homeless activities, the grantee can fill out Table 1C (see above) and Table 1B.

Table 1B Special Needs (Non-Homeless) Populations

SPECIAL NEEDS SUBPOPULATIONS	Priority Need Level High, Medium, Low, No Such Need	Unmet Need	Dollars to Address Unmet Need	Multi- Year Goals	Annual Goals
Elderly					
Frail Elderly					
Severe Mental Illness					
Developmentally Disabled					
Physically Disabled					
Persons w/ Alcohol/Other Drug Addictions					
Persons w/HIV/AIDS					
Victims of Domestic Violence					
Other					
TOTAL					

Housing

This section of the Three to Five Year Consolidated Plan covers the anticipated housing programs for the grantee. The grantee must describe:

Summary of housing needs (Table 2A);
Assessment of disproportionate need;
Summary of priority housing needs and activities (Table 2A);
Specific housing objectives (can be Table 2C);
Market analysis;
Needs of public housing;
Public housing strategy;
Barriers to affordable housing; and
For states only, the strategy for coordinating with Low Income Housing Tax Credits.

As noted above, for housing activities, the grantee must fill out Table 2A as follows:

Table 2A
Priority Housing Needs/Investment Plan Table

PRIORITY HOUSING NEEDS (households)		Priority	Unmet Need	MultiYrG oals	Annual Goals
		0-30%			
	Small Related	31-50%			
		51-80%			
		0-30%			
	Large Related	31-50%			
		51-80%			
Renter		0-30%			
	Elderly	31-50%			
		51-80%			
	All Other	0-30%			
		31-50%			
		51-80%			
		0-30%			
Owner		31-50%			
		51-80%			
Special Needs		0-80%			
Total Goals					
Total 215 Goals	·				
Total 215 Renter Goals					
Total 215 Owner Goals					

CDBG		
Acquisition of existing rental units		
Acquisition of existing rental units		
Production of new rental units		
Rehabilitation of existing rental units		
Rental assistance		
Acquisition of existing owner units		
Production of new owner units		
Rehabilitation of existing owner units		
Homeownership assistance		
HOME		
Acquisition of existing rental units		
Production of new rental units		
Rehabilitation of existing rental units		
Rental assistance		
Acquisition of existing owner units		
Production of new owner units		
Rehabilitation of existing owner units		
Homeownership assistance		
HOPWA		
Rental assistance		
Short term rent/mortgage utility payments		
Facility based housing development		
Facility based housing operations		
Supportive services		
Other		

Grantees can also fill out Table 2C to indicate intended program objectives:

Table 2C Summary of Specific Objectives

Specific Obj. #	Outcome/Objective Specific Objectives	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed
DH-1 Av	ailability/Accessibility of Decent Ho	using					
DH-1.1				2005			
			i	2006			
			j	2007			
			1	2008			
			1	2009			
			MULTI-YEAR GOAL				
DH-2 Aff	ordability of Decent Housing						
DH-2.1	-			2005			
			†	2006			
			•	2007			
			1	2008			
				2009			
		 	MULTI-YEAR GOAL				
DH-3 Sus	stainability of Decent Housing						
DH-3.1				2005			
			1	2006			
			i	2007			
			i	2008			
			+	2009			
			MULTI-YEAR GOAL	2007			

Grantees should follow similar guidance in filling out Table 2C as was provided above for Table 1C.

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Below is an example of how a grantee might fill out Table 2C. Assume that this grantee runs four types of programs: A homeowner rehabilitation program for very low-income elderly households; a homebuyer program that provides downpayment assistance; a public services program that offers an after school gang prevention counseling; and an economic development program that assists high tech start-up firms.

Specific Obj. #	Outcome/Objective Specific Objectives	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed
DH-2	Affordability of Decer	nt Housing					•
	Address the need for affordable decent	CDBG	■ Number of units occupied by very-low income elderly	2005	10		
	housing by offering		■ Number brought to standard	2006	20		
	rehabilitation assistance to very low	HOME	■ Number qualified as Energy Star■ Number of units made accessible	2007			
	income eiderly			2008			
	households			2009			
			MULTI-YEAR GOAL		120		
	Address the need for lagger affordable decent	HOME	Number of low-income households assistedNumber of first time homebuyers	2005			
	housing by offering		Number receiving counselingNumber receiving downpayment/closing costs	2006			
	downpayment assistance to low		Number receiving downpayment/closing costs	2007	50		
	income households			2008	50		
				2009			
			MULT	I-YEAR GOAL	170		
SL-3	Sustainability of Suita	able Living I	Environment				
	Improve the sustainability of the	CDBG	 Number of households assisted Number of persons with new access to a 	2005	10		
	suitable living		service	2006	100		
	environment by reducing gang-related			2007	100		
	crime through			2008	100		
	counseling programs			2009	100		
			MULT	I-YEAR GOAL	410		
E0-1	Availability/Accessib	ility of Econ	omic Opportunity				
	Enhance the accessibility of	CDBG	■ Total number of jobs ■ Employer sponsored health care	2005	10		
	economic opportunity		■ New businesses assisted	2006	50		
	and promote job creation by assisting]	2007	50		
	new high tech			2008	50		
	businesses to be created]	2009	50		
	u calcu		MULT	I-YEAR GOAL	210		

Community Development

This section of the Three to Five Year Plan covers the anticipated community development programs for the grantee. The grantee must describe:

Non-housing community development needs (can be Table 2B);
The basis for priority needs;
Obstacles to meeting underserved needs;
Specific long-term and short-term community development objectives (can be Table 2C); and
Antipoverty strategy.

As noted above, for housing activities, the grantee can fill out Table 2C as well as Table 2B as follows:

Table 2B

Level Unmet Low, Priority ed Need	Dollars	Multi- Year Goals	Annual Goals
			ł
			1
<u> </u>		T T	

	ition to the required community development sections outlined above, HUD mends that grantees develop a narrative on:
	The grantee's strategic vision for change if it has developed a comprehensive strategy;
	Barriers to affordable housing, including actions that the grantee will take to remove any local regulatory barriers;
	Neighborhood revitalization strategy areas, if the grantee will apply for this geographically targeted flexibility;
	Locally targeted and specific housing objectives that will address the creation of units, especially for minority persons;
	Local performance benchmarks, if the grantee wishes to set local outcome targets beyond the CPD system;
	Examples of how the grantee will revitalize public housing areas;
	Mapping data that helps describe areas of concentration or the location of units and services;
	Metropolitan/regional connections between this specific Con Plan and the larger area; and
	The ways in which the plan will address the community development needs of special populations.
The A	ction Plan
medium by the Plan, t	the grantee's Three to Five Year Consolidated Plan is intended to cover the m- and longer-term, the Annual Action Plan highlights the tasks to be undertaken grantee in the coming 12-month program year. Similar to the Three to Five Year he Annual Action Plan has been updated to include performance measures. The ections of the Action Plan include:
	Sources of Funds : The grantee must identify the public and private resources it plans to use to achieve the plan;
	Allocation Priorities and Geographic Distribution : The grantee must describe why it chose its allocation priorities and its planned geographic distribution of assistance;
	Homeless and Other Special Populations Activities: In this section the grantee will describe activities to address emergency shelter and transitional housing needs of homeless individuals and homeless families with children;
	Needs of Public Housing: The grantee must identify the manner in which the plan of the jurisdiction will address the needs of public housing;
	Antipoverty Strategy: In this section the grantee will describe the actions it plans to take during the next year to reduce the number of poverty level families;

☐ Lead-Based Paint Hazards: This section describes the actions that will take place during the next year to evaluate and reduce the number of housing units containing lead-based paint hazards in order to increase the inventory of leadsafe housing; ☐ Other Actions: The grantee must briefly describe actions that will take place during the next year to address obstacles to meeting underserved needs; foster and maintain affordable housing; remove barriers to affordable housing; develop institutional structure; enhance coordination between public and private housing, health, and social service agencies; and encourage public housing residents to become more involved in management and participate in homeownership; It is recommended that these ☐ Monitoring: In this section the grantee will briefly describe actions that will take indicators be the place during the next year to monitor its housing and community development same as the activities: CPD system -Grantees can add additional Statement of Specific Annual Objectives: This statement highlights the annual indicators as outcomes that the grantee intends to achieve under this Action Plan. locally needed for the Action The grantee can use Table 3A for this Statement. Plan period. Table 3A Summary of Specific Annual Objectives Outcome/Objective Performance Indicators Specific Annual Objectives EO-1 Availability/Accessibility of Economic Opportunity EO-1.1 2005 2006 200 2008 2009 MULTI-YEAR GOAL EO-2 Affordability of Economic Opportunity EO-2.1 2005 2006 200 2008 2009 MULTI-YEAR GOAL EO-3 Sustainability of Economic Opportunity EO-3.1 2005 2006 2007 2008 2009 MULTI-YEAR GOAL

The Specific Annual Objectives are intended to be the annual outcomes to be achieved by the program. The specific annual objectives should tie to the objectives described in the 3 to 5 Year Plan (Tables 1C and 2C) and these objectives can be copied from the 3 to 5 Year Plan and listed here. If the grantee will undertake <u>all of</u> the 3 to 5 year planned activities in the coming program year, then the annual objectives would be the same as the 3 to 5 year objectives. However, it is also possible that the annual objectives will be a subset of the longer term 3 to 5 year objectives. For example, the grantee might plan to start an economic development program in year 4 of the 5 Year Plan. This objective would thus not be included in the annual plan submitted in Year 2. See below for an example of this table.

This objective number relates

to the numbers

different types

for the nine

of outcome

statements

(see above).

suitable living

environment

and housing.

There are

separate sheets for

Below is an example of how a grantee might fill out Table 3A for the FY07 Action Plan. Assume that this same grantee as described in the example above and they run will run all four types of programs in FY07.

Specific Obj. #	Outcome/Objective Specific Annual Objectives	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed
DH-2	Affordability of Decer	nt Housing					
DH-2.1	Address the need for affordable decent	CDBG	■ Number of units occupied by very low income elderly	2005			
	housing by offering rehabilitation		■ Number brought to standard■ Number qualified as Energy Star	2006			
	assistance to very low	HOME	■ Number of units made accessible	2007	30		
	income elderly households			2008			
	nousenolus	-		2009 GOAL	30		
DH-2 2	Address the need for	HOME	■ Number of households low-income households	2005	30		
D11 2.2	affordable decent	TIONE	assisted				
	housing by offering downpayment		Number of first time homebuyersNumber receiving counseling	2006			
	assistance to low		■ Number receiving downpayment/closing costs	2007	50		
	income households			2008			
		-		2009	F.0		
CL 2	Containability of Coll	ا مستنبذ ا مامام		GOAL	50		
SL-3	Sustainability of Suita	able Living i	Environment				
SL-3.1	sustainability of the	CDBG	Number of households assistedNumber of persons with new access to a	200!			
	suitable living environment by		service	2006			
	reducing gang-related				7 100		
	crime through counseling programs			2008			
	counseling programs			2009			
FO 1	A	:::	and a Comment with the	GOAL	100		
EO-T	Availability/Accessib	ility of Econ	omic Opportunity				
	accessibility of	CDBG	■ Number of households assisted ■ Total number of jobs	200!			
	economic opportunity and promote job		■ Employer sponsored health care ■ New businesses assisted	2000			
	creation by assisting		- IVOW DUSINESSES ASSISTED	200			
	new high tech			2008			
	businesses to be created			2009			
				GOAL	50		

- ☐ Annual Affordable Housing Goals: Under this section, the grantee will describe the number of homeless, non-homeless, and special-needs households to be provided affordable housing;
 - > The grantee can use Table 3B to highlight these goals.

This number should be the grantee's best estimate of the total number of units to be completed during the grantee's coming 12month program year.

ANNUAL HOUSING COMPLETION GOALS

	Annual	Resor	irces used	during the p	period
	Expected Number Completed	CDBG	номе	ESG	HOPWA
ANNUAL AFFORDABLE HOUSING GOALS (SEC. 215)					
Homeless households					
Non-homeless households					
Special needs households					
ANNUAL AFFORDABLE RENTAL					
HOUSING GOALS (SEC. 215)					
Acquisition of existing units					
Production of new units					
Rehabilitation of existing units					
Rental Assistance					
Total Sec. 215 Affordable Rental					
ANNUAL AFFORDABLE OWNER					
HOUSING GOALS (SEC. 215)					
Acquisition of existing units					
Production of new units					
Rehabilitation of existing units					
Homebuyer Assistance					
Total Sec. 215 Affordable Owner					
ANNUAL AFFORDABLE					
HOUSING GOALS (SEC. 215)					
Acquisition of existing units					
Production of new units					
Rehabilitation of existing units					
Homebuyer Assistance					
Total Sec. 215 Affordable Housing					
ANNUAL HOUSING GOALS					
Annual Rental Housing Goal					
Annual Owner Housing Goal					
Total Annual Housing Goal					

	annual outcomes the CPD measure the outcomes/ob Description of A	s/objectives it expects to a res within Tables 3A and 3 rjectives in its Action Plan in Activities: The grantee muluring the program year. T	gulations, the grantee must identify the chieve. The grantee can incorporate C. The grantee can also incorporate narratives or in locally-designed tables. It describe the types of activities it he grantee can use Table 3C to	
	U.S. Department of Housing and Urban Development		OMB Approval No. 2506-0117 (Exp. 8/31/2008)	
		Table 3 Consolidated Plan Lis		
	Jurisdiction's Name			
	Priority Need			
	Project Title			
	Description			The grantee should check the appropriate
The objective number is the			ecent Housing	box for each. Only one objective and one outcome should be chosen for
numeric identification of the CPD outcome statement – such as EO	Location/Target Area			each activity.
1.1	Objective Number	Project ID	Funding Sources: CDBG	
It is recommended	HUD Matrix Code	CDBG Citation	ESG HOME	
that the performance	Type of Recipient	CDBG National Objective	HOPWA Total Formula	
indicator be the same indicators as	Start Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)		
those listed in the CPD	Performance Indicator	Annual Units	Other Funding Total	
system. Grantees can choose	Local ID	Units Upon Completion	10:01	
additional indicators.	The primary purpose of the project	is to help: the Homeless Persons with	a HIV/AIDS Persons with Disabilities Public Housing Needs	

Below is an example of how a grantee might fill out Table 3C for the F707 Action Plan for one program run by a grantee. Assume that this same grantee as described in the example above.

Table 3C **Consolidated Plan Listing of Projects**

Jurisdiction's Name: City of Westville **Priority Need:** Owner Occupied Housing

Project Title: Homeowner Rehabilitation for Very Low Income Seniors

D	1 4.1	
Descr	Intin	r
DUSUI	iptio	

This program will offer loans and grants to very low income seniors living throughout the jurisdiction. The purpose is to assist these seniors to rehabilitate their homes. The primary focus will be on seniors living in extremely dilapidated homes and those needing handicapped

participants must be considere as adjusted by family size. The	antee expects that it will be able to serve appro d an elderly household and their household inc e program will be available to seniors living any 's Prospect Heights neighborhood, a HUD-app	ome may not exceed HUD's publishe where in the city, although preference	d very low income limits,
Outcome category: Ava	able Living Environment X Decent Housing ilability/Accessibility X Affordability	Sustainability	oorhood.
Objective Number DH 2.1	Project ID 07-01	Funding Sources: CDBG	\$1,000,000
HUD Matrix Code 14A	CDBG Citation 570.201	ESG HOME	\$500,000
Type of Recipient Grantee	CDBG National Objective LMI Housing	HOPWA Total Formula	
Start Date (mm/dd/yyyy) 1/1/07	Completion Date (mm/dd/yyyy) 12/31/07	Prior Year Funds Assisted Housing	
 Performance Indicator Number of units occupied by very low income elderly Number brought to standard 	Annual Units 30	PHA Other Funding Total	\$500,000 \$2,000,000
 Number qualified as Energy Star Number of units made accessible 			
Local ID	Units Upon Completion 120	•	

The primary purpose of the project	t is to help: $igsqcup$ the Homeless $igsqcup$	_ Persons with HIV/AIDS [Persons with Disabilities $oxdot$	_ Public Housing Needs
------------------------------------	------------------------------------------------	---------------------------	-----------------------------------	------------------------

Note that states do not provide a list of planned activities, they provide a Method of Distribution (MOD). The MOD is to describe the various funding resources including program income, etc.; the funding categories the state has; whether the state will allow Section 108 Loan Guarantees, Float-Financed Activities, or Community Revitalization Strategy Areas (and if so, how and how much); and the selection criteria and threshold factors the state will use.

In addition to the general Action Plan sections, each of the programs requires specific text, including (Note: this list is not all inclusive and grantees must consult with the Con Plan regulations for more information. In some cases, this narrative may differ for state and local grantees):

ч	CL	DBG-specific narrative includes:
	>	Sources of funds;
	>	Float-funded activities;
	>	Program benefit and location;
	>	Contingency; and
	>	Urgent needs.
	HC	DME-specific narrative includes:
	>	Resale/recapture provisions;
	>	HOME tenant-based rental assistance;
	>	Other forms of investment;
	>	Affirmative marketing;
	>	Minority/women's business outreach;
	>	Refinancing;
	>	American Dream Downpayment initiative; and
	>	Minority homeownership.
	ES	G-specific narrative includes:
	>	Process and criteria for awarding grant funds; and
	>	Source and amount of matching funds.
	HC	DPWA-specific narrative includes:
	>	How the proposed activities will be used to meet the urgent needs of persons with HIV/AIDS and their families;

- The public and private resources expected to be made available in connection with the proposed activities being funded;
- The method of selecting project sponsors; and
- HIV/AIDS housing goals.

Finally, the Action Plan includes an optional but suggested narrative on: Updated Analysis of Impediments to Fair Housing Choice; Local Performance Measurement Systems; and Neighborhood Strategy Areas.

Using The Consolidated Plan Management Process (CPMP)

The Consolidated Plan Management Process (CPMP) is a tool developed by HUD to assist grantees in completing their Con Plans. It includes three key sections:

☐ Three to	Five	Year	Plan;
------------	------	------	-------

- Action Plan; and
- ☐ CAPER.

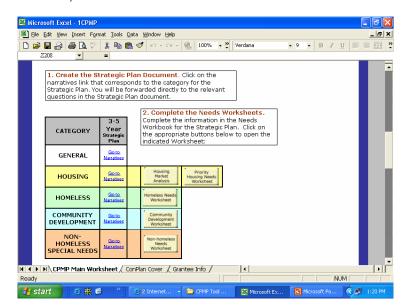
By being set up in this way, the CPMP tool readily enables the grantee to enter data into the appropriate sections of the Plan and then tie the Plan and the CAPER together. Use of the CPMP tool is optional. However, many grantees have found it to be a helpful tool in planning and tracking their programs.

The CPMP tool is free to grantees and can be found at http://www.hud.gov/offices/cpd/about/conplan/toolsandguidance/cpmp/index.cfm, along with helpful advice in how to use the tool.

The CPMP tool has been updated to reflect the latest CPD performance measurement guidelines. While many of the CPMP data collection instruments will look similar to the tables described in the previous sections of this text, there are a few differences. The

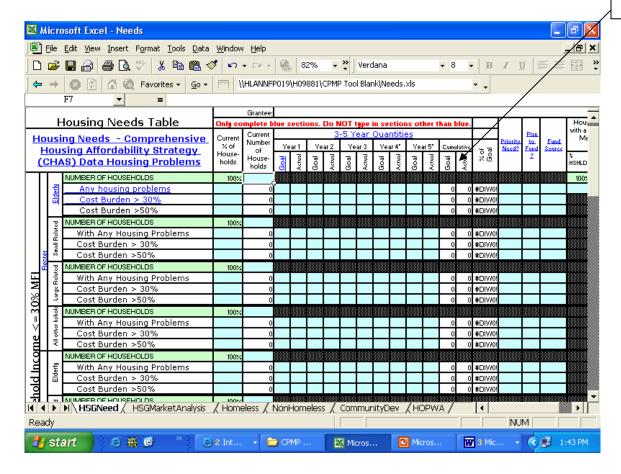
following text briefly highlights the use of CPMP for planning desired grantee outcomes.

The CPMP begins with the Three to Five Year Consolidated Plan and includes sections where that narrative can be entered.



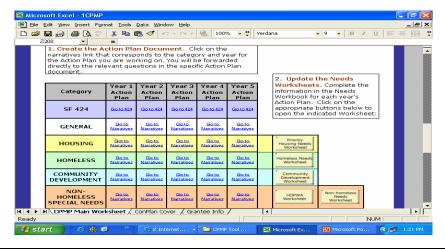
The CPMP then asks the grantee to fill out the tables related to the Three to Five Year Plan, including housing needs:

Note that the Actuals are not reported until the CAPER is submitted.

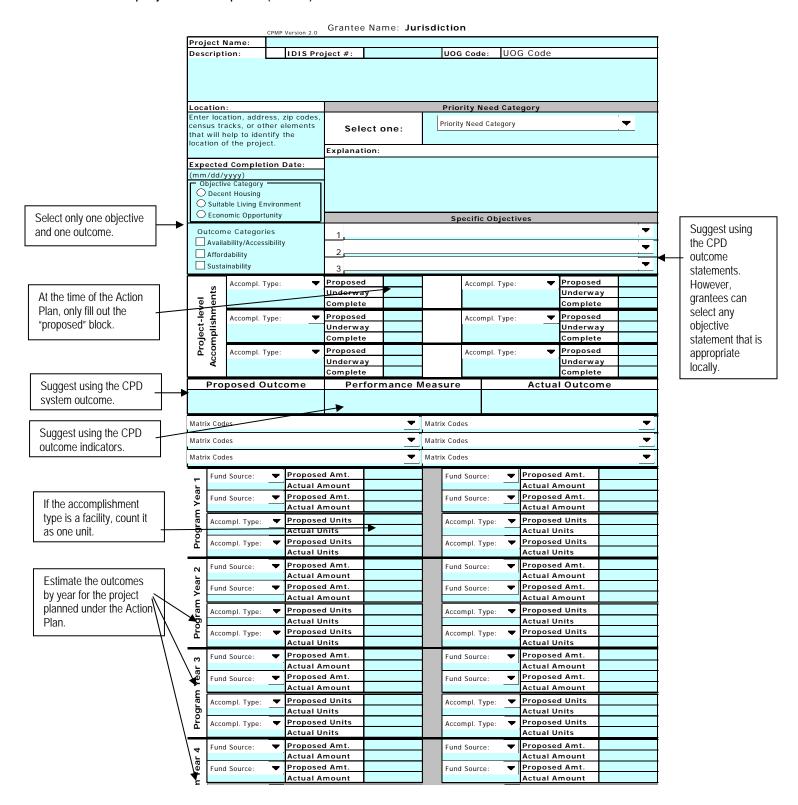


There are similar tables for community development and homeless/persons with special needs. There is also a table on the program specific objectives, similar to the annual one shown in the section below.

After the Three to Five Year Plan is complete, the CPMP assists the user to complete the Action Plan narrative.



The grantee then completes the Action Plan tables, including the needs summary and the projects description (below).



Finally, the grantee completes the Summary of Specific Annual Objectives for the projects it has identified.

CPMP Version 2.0

New Specific

It is

recommended

the same as the CPD system –

Grantees can add additional

indicators as

locally needed

for the Action

Plan period.

that these indicators be

This objective number relates to the numbers for the nine different types of outcome statements (see above). There are separate sheets for suitable living environment and economic opportunity.

Jurisdiction

Number Number Comple	Sources of Funds	Outcome/Objective Specific Annual Objectives	Specific Obj. #
	ing	Availability/Accessibility of Decent Ho	DH-1
e of Funds #1 Performance Indicator #1 2005 #DIV/	Source of Funds #1	Specific Objective	DH-1 (1)
2006 #DIV			#
e of Funds #2 2007 #DIV	Source of Funds #2		/
2008 #DIV			
e of Funds #3 2009 #DIV	Source of Funds #3		
MULTI-YEAR GOAL 0 #DIV			
e of Funds #1 Performance Indicator #2 2005 #DIV	Source of Funds #1		
2006 #DIV			
e of Funds #2 2007 #DIV	Source of Funds #2		
2008 #DIV		Specific Annual Objective	
	Source of Funds #3		
MULTI-YEAR GOAL 0 #DIV			
	Source of Funds #1 Performance Indicator #3 20		
	Source of Funds #2	•	
		7	
2006 2007 2008	Source of Funds #1 Source of Funds #2 Source of Funds #3	\	

The Specific Objectives are intended to be the specific annual outcomes to be achieved by the program. Grantees can elect to develop their own specific annual objectives but they will still need to report on the CPD system outcomes, objectives and indicators in IDIS and the CAPER. The grantee can also simply use one or more of the outcome statements from the CPD system (such as availability of decent housing) and add any context for the grantee's specific program (see the example).

Other Implementation Tasks

In addition to the Con Plan, the grantee needs to undertake additional steps in the process of implementing the outcome measures. During the initial year of the CPD performance measures, the grantee needs to share information with its partners so that these partners understand the necessity and uses of the outcome system. Key partners and others who need to be informed about the system include:

,
Political leaders; and
State recipients, subrecipients, developers, COGs/planning districts, other partners.

There are many options for how the grantee can inform these partners about the requirements and benefits of performance measurement, including:

Outreach materials;
Briefing sessions; and

☐ Staff training.

□ Grantee staff:

Once all of the partners have been briefed, it is important that the grantee begin to collect the outcome data. For many grantees, much of the anticipated outcome information will be collected in the initial application kit that it uses to identify proposed projects. For example, the initial project application can provide a summary of the type of proposed project and its intended outcomes. This, in turn, will assist the grantee or the applicant in selecting an appropriate outcome and objective.

So, grantees should evaluate their existing application materials and assess where and how relevant outcome data should be collected. Likely outcome-related data items that would be useful to collect in the application include:

Intended result of project; and
Program design information that can help inform likely outcome indicators (such
as whether the applicant plans to bring units up to Energy Star standards).

As a part of the application process, the grantee needs to determine whether the applicant or the grantee staff will assign the outcome and objective to the project. Some grantees may prefer to allow the applicant to identify the intended results while other grantees feel that it is more efficient for grantee staff to make this determination.

Once the application kit is updated, the grantee needs to consider whether the outcome measures will affect the project selection process. For example, a grantee could determine that it will have an application selection preference for projects that address one particular type of outcome or objective. Alternately, the grantee could give greater preference for applications that demonstrate a higher number of units produced or households served. It is up to the grantee to determine whether the outcome system will be used in the project selection process. If the grantee has determined that the outcomes will be a factor in awarding projects, it is recommended that these decision factors be enumerated in a policy document that ensures the fair implementation of the policy.

After projects have made it through the selection process and the grantee is ready to sign a funding agreement with the developer, CHDO, subrecipient, or other partner, it is important that the grantee's agreement clearly elaborate on its requirements and policies regarding needed data. In addition to any standard compliance-related requirements, the agreement should clearly state:

☐ The type of outcome data to be reported;			
☐ The timeframe for submission of outcome data; and			
☐ The files to be kept to document results.			
At the start of the new funding cycle, many grantees conduct implementation workshops to inform partner staff of their rules and requirements. If the grantee elects to offer this type of training, it should incorporate the outcome measures and the related data collection in this training. Training topics could include:			
☐ Why performance measurement is important;			
☐ Definitions of outcomes, objectives, and indicators;			

		Tips for collecting difficult data items;	
		Sample forms or checklists; and	
		Changes in the previous grant agreement and reporting responsibilities.	
As a part of these outreach and data collection efforts, the grantee should evaluate its data collection forms. Most grantees use a standard set of forms that subrecipients, developers, CHDOs, and others use to collect and report data to the grantee. The grantee should take this opportunity to assess whether these forms:			
		Collect all of the compliance data that is needed;	
		Collect all of the outcome indicator data that is needed;	
		Are well-designed and user-friendly.	
If the grantee elects to update its forms, it may wish to obtain input from not only the grantee program staff but also the grantee's IDIS staff and the partners who will need to use the forms.			
t is also important to note that not all of the outcome data will be collected at the same time. In general, the timing of the outcome data collection will vary based upon the project type:			
		Some projects – such as many community facilities – will report on data that is known at the outset of a project. For example, if the CDBG grantee is funding a community center, the indicator for that activity will be based on the number of persons getting access to the new facility. The grantee will likely determine this when it selects the project and ensures national objective compliance. So, this outcome data can be entered when the project is set up.	
		Other projects – such as housing projects – are created with a direct beneficiary in mind. The outcome data on that activity cannot be entered until the household is selected and information about it is collected. For example, the grantee will not be able to fill out the income, race/ethnicity, or disability indicator information until a particular unit is occupied. So, this type of outcome data is likely to be obtained later in the process, once the activity is complete.	
		Finally, some projects are ongoing or have an extended timeframe for collecting outcome data. For example, economic development projects that create jobs might require a few years until all the hiring is complete. The grantee will likely want to collect and enter that data on a periodic basis as it is received while jobs are being created. The grantee could wait until all jobs were created to enter any outcome data but that could add to administrative burden and delay the reporting of partial results.	
~		the HOME FOO and HODWA data in collected and account at in IDIO at the	

Currently, HOME, ESG, and HOPWA data is collected and reported in IDIS at the project address level. However, CDBG data is collected and reported at the activity level. For example, a CDBG grantee could set up a homeowner rehabilitation activity that might be inclusive of 20 different units. The HOME Program would require that individual address and characteristic data be entered for each of these 20 sites. The

CDBG program allows grantees to aggregate the data and enter it all at once as one, 20-unit activity.

In the short term, CDBG grantees can continue to operate under this approach. However, in FY07 this policy may change for housing activities under CDBG so that HUD and grantees can be aware of the individual characteristics of the households served.

For projects where the CPD programs cover only a part of the overall funding, grantees will count **all** outcomes from the project. For example:

- ☐ HOPWA funds land acquisition and private funds are used for development
 - > Count all units even though HOPWA provides only partial funding;
- ☐ HOME funds the construction of 25 of 100 units in a rental housing project
 - Provide data on HOME units and data on other units; and
- ☐ CDBG pays for half of the cost of a counseling program
 - Count all counseled persons.

Grantees are not required to report on community development activities that do not contain HUD CPD funds (HOME, CDBG, ESG, HOPWA) in some phase of the activity. However, grantees may wish to track this data to assess its own progress.

At the completion of the project, the grantee will submit a CAPER to report on the results of the activities. The CAPER has both narrative and tables. If the grantee is using CPMP, the CAPER reporting is readily tied into the intended outcomes that were listed in the Action Plan. If the grantee is not using the CPMP, the grantee will need to undertake its own analysis of its progress toward the planned outcomes. More information about the CAPER and about evaluating program performance can be found in Chapter 13.

GUIDELINES FOR PREPARING A CONSOLIDATED PLAN SUBMISSION FOR LOCAL JURISDICTIONS

U.S. Department of Housing and Urban Development Office of Community Planning and Development

INTRODUCTION

The Consolidated Plan is designed to be a collaborative process whereby a community establishes a unified vision for community development actions. It offers local jurisdictions the opportunity to shape the various housing and community development programs into effective, coordinated neighborhood and community development strategies. It also creates the opportunity for strategic planning and citizen participation to take place in a comprehensive context, and to reduce duplication of effort at the local level.

The strategic plan is a specific course of action for revitalization. It is the means to analyze the full local context and the linkages to the larger region. It builds on local assets and coordinates a response to the needs of the community. It integrates economic, physical, environmental, community, and human development in a comprehensive and coordinated fashion so that families and communities can work together and thrive. A strategic plan also sets forth program goals, specific objectives, annual goals, and benchmarks for measuring progress. In so doing, it helps local governments and citizens keep track of results and learn what works.

The Consolidated Plan approach is also the means to meet the submission requirements for the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) formula programs. This process replaces prior CPD planning and submission requirements with a single document that satisfies the submission requirements of the four CPD formula programs for local jurisdictions.

The statutes for the formula grant programs set forth three basic goals against which the plan and the jurisdiction's performance under the plan will be evaluated by HUD. Each jurisdiction's plan must state how it will pursue these goals for all community development programs, as well as all housing programs. These statutory program goals are:

DECENT HOUSING - - which includes:

- assisting homeless persons obtain affordable housing;
- assisting persons at risk of becoming homeless;
- retaining the affordable housing stock;
- increasing the availability of affordable permanent housing in standard condition to low-income and moderate-income families, particularly to members of disadvantaged minorities without discrimination on the basis of race, color, religion, sex, national origin, familial status, or disability;
- increasing the supply of supportive housing which includes structural features and services to enable persons with special needs (including persons with HIV/AIDS) to

- live in dignity and independence; and
- providing affordable housing that is accessible to job opportunities.

A SUITABLE LIVING ENVIRONMENT - - which includes:

- improving the safety and livability of neighborhoods;
- eliminating blighting influences and the deterioration of property and facilities;
- increasing access to quality public and private facilities and services;
- reducing the isolation of income groups within areas through spatial deconcentration
 of housing opportunities for lower income persons and the revitalization of
 deteriorating neighborhoods;
- restoring and preserving properties of special historic, architectural, or aesthetic value; and
- conserving energy resources.

EXPANDED ECONOMIC OPPORTUNITIES - - which includes:

- job creation and retention;
- establishment, stabilization and expansion of small businesses (including microbusinesses);
- the provision of public services concerned with employment;
- the provision of jobs to low-income persons living in areas affected by those programs and activities, or jobs resulting from carrying out activities under programs covered by the plan;
- availability of mortgage financing for low-income persons at reasonable rates using non-discriminatory lending practices;
- access to capital and credit for development activities that promote the long-term economic and social viability of the community; and
- empowerment and self-sufficiency for low-income persons to reduce generational poverty in federally assisted housing and public housing.

At each jurisdiction's discretion, the information can be displayed in any clear, concise format that communicates the key elements of the plan to citizens. These elements include the needs assessment, priority needs, specific objectives, and how the activities address identified needs and objectives. All required elements of the plan (including tables and narratives) should be submitted to HUD in an electronic format. Electronic data assists HUD and its program partners to exchange information more easily and better serves the families and communities that HUD programs are designed to serve.

Public reporting burden for this collection is estimated to average 395 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This agency may not conduct or sponsor, and you are not required to respond to, a collection of information unless it displays a currently valid OMB control number. This collection of information is required by 24 CFR Part 91 which requires a jurisdiction administering CPD programs to submit Consolidated Plans and Performance Reports on progress it has made in carrying out its strategic plan and action plan. OMB Approval No. 2506-0117 (exp. 3/31/2008)

PREPARING A CONSOLIDATED PLAN SUBMISSION

These steps guide the jurisdiction through the process of preparing its consolidated plan and action plan submission to HUD.

I. Managing the Process

The consolidated plan submission process envisions that housing and community development planning and programming will be accomplished through a unified and comprehensive framework that opens new opportunities for collaboration and collective problem-solving. Partnerships among government agencies and between government and private groups are developed in order to marshal government and private resources to achieve intended public purposes. These steps require jurisdictions to take and/or describe specific actions and initiatives relevant to the preparation of the consolidated plan.

Presubmission requirements:

Required Consultation - Jurisdictions must consult and coordinate with appropriate public and private agencies, such as the State and other local jurisdictions; public and private agencies that provide assisted housing, health services, and social and fair housing service agencies including services to children, elderly persons, homeless persons, persons with disabilities (including persons with HIV/AIDS and their families); and other categories of residents, and among its own departments, to assure that its consolidated plan is a comprehensive document and addresses statutory purposes.

Lead - Based Paint - The jurisdiction must consult with state and local health and child welfare agencies, and examine data on hazards and poisonings, including health department data on the addresses of housing units in which children have been identified as lead poisoned.

Submission Requirements:

Lead Agency - The jurisdiction must identify the lead agency or entity for overseeing the development of the plan and the major public and private agencies responsible for administering programs covered by the consolidated plan.

Consultation/Coordination - The jurisdiction must identify the significant aspects of the process by which the plan was developed, the agencies, groups, organizations (including businesses, developers, community and faith-based organizations), and others that participated in the process. It must briefly describe the jurisdiction's consultation with housing, health, social service agencies, and other entities, including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, homeless and chronically homeless persons, as well as activities it will undertake to enhance coordination between public and assisted housing providers, and among private and governmental health, mental health, and service agencies. HOPWA

grantees must consult broadly to develop a metropolitan-wide strategy and other jurisdictions must assist in the preparation of the HOPWA submission.

Institutional Structure - The jurisdiction must provide a concise summary of the institutional structure through which it will carry out its consolidated plan, including private industry, non-profit organizations, community and faith-based organizations, and public institutions. The jurisdiction must also assess the strengths and gaps in the delivery system.

Guidance:

Collaboration and Partnership - In organizing to prepare the consolidated plan submission, has the jurisdiction considered establishing new relationships and organizational structures among various agencies and organizations in order to maximize the benefits that should arise from the collective problem solving and coordinated activities? Does the lead agency that coordinates the consolidated planning and submission process have adequate authority and ability to accomplish the following:

- Develop interagency agreements and coordinating bodies that can facilitate cooperation among the jurisdiction's line agencies?
- Work with other jurisdictions and organizations that have a regional responsibility for economic development, business, employment, and planning?
- Provide continuity of management for the process over time and the confidence of citizen organizations that citizens participating in the process have meaningful access to the decision making process?

Leadership -- The consolidated plan should have the clear backing and support of the Mayor or Chief Elected Official. Real cooperation and coordination will not occur without leadership by the jurisdiction's elected officials and citizens will not participate in a process that does not have leadership by elected officials. Leadership also aids in the effective implementation of the plan and increases commitment to the plan.

Economic Development -- The consolidated plan should describe efforts to enhance coordination with private industry, businesses, developers, and social service agencies, particularly with regard to the development of the jurisdictions' economic development strategy.

Citizen Participation

The consolidated plan must result from an effective citizen participation process. Existing, ongoing citizen participation activities may be used when they are strong and vital. Jurisdictions have the flexibility to choose the participation process that best works for the low-income

citizens who are the primary clients for HUD programs.

The jurisdiction must develop and follow a detailed citizen participation plan that addresses each of the following elements. Citizens, non-profit organizations and other interested parties must be afforded adequate opportunity to review and comment on the original citizen participation plan, on substantial amendments to the citizen participation plan, and must make the citizen participation plan public.

Participation -- The citizen participation plan must provide for and encourage citizens to participate in the development of the consolidated plan, any substantial amendments to the consolidated plan, and the performance report. These requirements are designed especially to encourage participation of low- and moderate- income residents where housing and community development funds may be spent. The jurisdiction is expected to take whatever actions are appropriate to encourage the participation of all its residents, including minorities and non-English speaking persons, as well as persons with disabilities. The jurisdiction shall encourage the participation of local and regional institutions and other organizations (including businesses, developers, community and faith-based organizations) in the process of developing and implementing the consolidated plan.

The jurisdiction shall also encourage the participation of residents of public and assisted housing developments and recipients of tenant-based assistance in the process of developing and implementing the consolidated plan, along with other low-income residents of targeted revitalization areas in which the developments are located. The jurisdiction shall make an effort to provide information to the housing agency about consolidated plan activities related to its developments and surrounding communities that the housing agency can make available at the annual public hearing required for the Public Housing Agency Plan.

Access to Information -- Citizens, public agencies, and other interested parties, including those most affected, must have the opportunity to receive information, review and submit comments on any proposed submission concerning the proposed activities, including the amount of assistance the jurisdiction expects to receive (including grant funds and program income), and the range of activities that may be undertaken, including the estimated amount of CDBG and other funds proposed to be used for activities that will benefit persons of low- and moderate-income.

Anti-displacement -- The citizen participation plan must set forth the jurisdiction's plans to minimize displacement of persons and to assist any persons displaced, specifying the types and levels of assistance the jurisdiction will make available (or require others to make available) to persons displaced, even if the jurisdiction expects no displacement to occur.

Publishing the Plan - The jurisdiction must publish its proposed consolidated plan submission so that affected citizens have sufficient opportunity to review it and provide

comments. The requirement for publishing may be met by publishing a summary of the proposed consolidated plan in one or more newspapers of general circulation and making copies of the proposed plan available at libraries, government offices, and public places. The summary must describe the contents and purpose of the consolidated plan, and must include a list of the locations where copies of the entire plan may be examined. The jurisdiction must also provide a reasonable number of free copies of the plan to citizens and groups that request it.

Public Hearings -- The jurisdiction must provide at least two public hearings per year to obtain citizens' views and to respond to proposals and questions, to be conducted at a minimum of two different stages of the program year. Together, the hearings must address housing and community development needs, development of proposed activities, and review of program performance.

In order to obtain the views of citizens on housing and community development needs, including priority nonhousing community development needs, the citizen participation plan must provide that at least one of these hearings is held before the proposed consolidated plan is published for comment.

The citizen participation plan must provide that hearings be held at times and locations convenient to potential and actual beneficiaries, and with accommodation for persons with disabilities. The citizen participation plan must specify how it will meet these requirements.

The citizen participation plan must identify how the needs of non-English speaking residents will be met in the case of public hearings where a significant number of non-English speaking residents can be reasonably expected to participate.

Notice of Hearings -- The citizen participation plan must state how and when adequate advance notice will be given to citizens of each hearing (including residents of assisted and public housing) and sufficient information must be published about the subject of the hearing. (Although HUD is not specifying the length of notice required, two weeks is considered adequate. However, publishing small print notices in the newspaper a few days before the hearings does not constitute adequate notice.)

Access to Meetings -- The citizen participation plan must provide citizens with reasonable and timely access to local meetings.

Comments -- The citizen participation plan must provide a period of not less than 30 days, prior to the submission of the consolidated plan, to receive comments from citizens. The jurisdiction must consider the views of citizens, public agencies and other interested parties in preparing its final consolidated submission.

Substantial Amendments -- The citizen participation plan must specify the criteria the jurisdiction will use for determining what changes in the jurisdiction's planned or actual

activities constitute a substantial amendment to the consolidated plan. It must include among the criteria for a substantial amendment changes in the use of CDBG funds from one eligible activity to another. The citizen participation plan must provide at least 30 days to receive comments on a substantial amendment before the amendment is implemented. The citizen participation plan shall require the jurisdiction to consider any comments or views of citizens received in writing, or orally at public hearings, if any, in preparing the substantial amendment. A summary of these comment and a summary of any comments or views not accepted and the reasons therefore, shall be attached to the substantial amendment.

Performance Reports -- The citizen participation plan must provide citizens with reasonable notice and an opportunity too comment on performance reports. The citizen participation plan must state how reasonable notice and an opportunity to comment will be given. The citizen participation plan must provide at least 15 days to receive comments on the performance report that is to be submitted to HUD before its submission. The citizen participation plan shall require the jurisdiction to consider any comments or views of citizens received in writing, or orally at public hearings in preparing the performance report. A summary of these comments shall be attached to the performance report.

Availability to the Public -- The citizen participation plan must provide that the consolidated plan as adopted, substantial amendments, and the performance report will be available to the public, including the availability of materials in a form accessible to persons with disabilities, upon request. The citizen participation plan must state how these documents will be available to the public.

Access to Records -- The citizen participation plan must require the jurisdiction to provide citizens, public agencies, and other interested parties with reasonable and timely access to information and records relating to the jurisdiction's consolidated plan and the jurisdiction's use of assistance under the programs covered by the plan during the preceding five years.

Technical Assistance -- The citizen participation plan must provide for technical assistance to groups representative of persons of low- and moderate-income that request such assistance in developing proposals for funding assistance under the consolidated plan.

Complaints -- The jurisdiction must describe appropriate and practicable procedures to handle complaints from citizens related to the consolidated plan, amendments, and performance report. At a minimum, the citizen participation plan shall require the jurisdiction to provide a timely, substantive written response to every written citizen complaint, within an established period of time (within 15 days, where practicable, if the jurisdiction is a CDBG grant recipient).

Amendments -- Prior to the submission of any substantial change in the proposed use of

funds, citizens must have reasonable notice of, and opportunity to comment on, the proposed amendment.

Submission Requirements:

Executive Summary -- a clear, concise executive summary that included the objectives and outcomes identified in the plan and an evaluation of past performance.

Citizen Participation -- a summary of the citizen participation and consultation process, a summary of citizen comments or views on the plan, and efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities. The summary of citizen comments must include a summary of any comments or views not accepted and the reasons why they were not accepted.

Guidance:

The plan should include or provide:

Public Notices -- for citizen participation through one or more of the following: publication of notices and information in nonlegal sections of major newspapers; in neighborhood, minority, and non-English newspapers; through public service announcements over radio and television; by direct mailings and phone contacts to organizations that have requested it. Notices should be published 14 calendar days prior to a public hearing or a deadline.

Public Hearings -- hold hearings and meetings at times and places that are convenient and comfortable for people most affected by the proposal. Hearings or informational meetings should be held on weekends or in the evening preferably near neighborhoods that are targeted for assistance.

Public Involvement -- explore alternative public involvement techniques and quantitative ways to measure efforts that encourage citizen participation in a shared vision for change in communities and neighborhoods, and the review of program performance, e.g., use of focus groups, and use of the Internet.

Availability to the Public -- provide the proposed and final consolidated plan submission on the Internet so affected citizens have sufficient opportunity to review it and provide comments.

Technical Assistance -- consider providing technical assistance for proposals that strengthen and expand the role of community based development organizations in planning retail, commercial, affordable housing and other public improvements.

II. Strategic Plan

The jurisdiction must produce a strategic plan for a period designated by the jurisdiction that brings needs, priority needs, priorities, specific objectives, and strategies together in a coherent strategic plan. In identifying and describing its needs, the jurisdiction is encouraged to draw relevant information from previous submissions and other reports and studies, as appropriate. The strategic plan must be developed to achieve the following statutory goals and objectives, principally for extremely low-, low- and moderate-income residents:

- provide decent housing and
- a suitable living environment and
- expand economic opportunities.

Submission Requirements:

Time Period -- The jurisdiction must state the period of time covered by the plan.

Priority Needs Analysis and Strategies -- The jurisdiction must indicate the priority needs in accordance with the priority needs tables prescribed by HUD, describe the reasons for assigning the priority given to each category of priority needs, and identify any obstacles to meeting underserved needs. In addition, the jurisdiction must describe the general priorities for allocating investment geographically within the jurisdiction (or within the EMSA for the HOPWA program) and among priority needs and activities. The rationale for establishing relative priority needs should flow logically from this analysis.

Specific Objectives -- The jurisdiction's strategic plan must summarize priorities and specific objectives it intends to initiate and/or complete in accordance with the tables prescribed by HUD and how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan. Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments and outcomes the jurisdiction hopes to achieve in quantitative terms over a specified the time period (i.e., one, two, three, or more years), or in other measurable terms as identified and defined by the jurisdiction. Jurisdictions are encouraged to identify specific objectives under general outcome and objective categories involving the availability/accessibility, affordability, and sustainability of decent housing, a suitable living environment, and economic opportunity.

The jurisdiction must address the following concerns, preferably through a coordinated strategy:

Submission Requirements:

HOMELESS

Homeless Needs -- The jurisdiction must provide a concise summary of the nature and extent of homelessness in the jurisdiction, (including rural homelessness and chronically

homeless persons where applicable), addressing separately the need for facilities and services for homeless persons and homeless families with children, both sheltered and unsheltered, and homeless subpopulations, in accordance with Table 1A. The summary must include the characteristics and needs of low-income individuals and children, (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered. In addition, to the extent information is available, the plan must include a description of the nature and extent of homelessness by racial and ethnic group.

Inventory -- The jurisdiction shall provide a concise summary of the existing facilities and services (including a brief inventory) that assist homeless persons and families with children and subpopulations identified in Table 1A or the most current chart from the Continuum of Care SuperNOFA application. These include outreach and assessment, emergency shelters and services, transitional housing, permanent supportive housing, access to permanent housing, and activities to prevent low-income individuals and families with children (especially extremely low-income) from becoming homeless. The jurisdiction can use the optional Continuum of Care Housing Activity Chart and Service Activity Chart to meet this requirement.

Priority Homeless Needs -- Using the results of the Continuum of Care planning process, identify the jurisdiction's homeless and homeless prevention priorities specified in Table 1A or the most current chart from the Continuum of Care SuperNOFA application. The description of the jurisdiction's choice of priority needs and allocation priorities must be based on reliable data meeting HUD standards and should reflect the required consultation with homeless assistance providers, homeless persons, and other concerned citizens regarding the needs of homeless families with children and individuals. The jurisdiction must provide an analysis of how the needs of each category of residents provided the basis for determining the relative priority of each priority homeless need category.

Homeless Strategy -- Describe the jurisdiction's strategy for developing a system to address homelessness and the priority needs of homeless persons and families (including the subpopulations identified in the needs section). The jurisdiction's strategy must consider the housing and supportive services needed in each stage of the process. These include preventing homelessness, outreach/assessment, emergency shelters and services, transitional housing, and helping homeless persons (especially any persons that are chronically homeless) make the transition to permanent housing and independent living. The jurisdiction must also describe its strategy for helping extremely low- and low-income individuals and families who are at imminent risk of becoming homeless.

Specific Objectives -- Identify specific objectives developed in accordance with the statutory goals described in section 24 CFR 91.1 that the jurisdiction intends to initiate and/or complete in accordance with the tables prescribed by HUD, and how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic

plan. Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments and outcomes the jurisdiction hopes to achieve in quantitative terms over a specified time period (i.e., one, two, three, or more years), or in other measurable terms as identified and defined by the jurisdiction. Jurisdictions are encouraged to identify specific objectives under general outcome and objective categories involving the availability/accessibility, affordability, and sustainability of decent housing, a suitable living environment, and economic opportunity using optional Table 1C and 2C. If these tables are not used, jurisdictions must provide comparable information that is required by the consolidated plan regulation.

Homeless Guidance:

Continuum of Care -- Jurisdictions are encouraged to standardize similar elements contained in the Consolidated Plan and the Continuum of Care Plan, thereby linking the two documents and reducing duplication of effort, particularly where the Continuum of Care geography is coterminous with the Consolidated Plan geography. The jurisdiction should provide a brief inventory of facilities and services for assisting homeless persons, (including any persons that are chronically homeless), and preventing homelessness. The inventory should include (to the extent information is available to the jurisdiction) an estimate of the number of beds and supportive service programs that are serving people that are chronically homeless. Completing the Continuum of Care and Housing Activity Chart and Service Activity Chart from an appropriate application relevant to the jurisdiction's geography will serve this purpose. Guidance on how this can be done is included as an attachment to Table 1A, the Continuum of Care Homeless Gap Analysis Chart.

Homeless Strategy -- The jurisdiction should describe its strategy for addressing the needs of homeless individuals and families with children and the subpopulations identified in the Homeless Populations and Subpopulations Chart. The strategy should address the need for expansion of Continuum of Care components, including outreach, emergency shelters, transitional housing, permanent supportive housing, and prevention of homelessness. In a narrative, describe the goals, programs, and policy initiatives the community expects to accomplish during the period covered by the strategic plan to address the unmet needs of homeless individuals and families with children, as well as subpopulations.

Chronic Homelessness -- The jurisdiction should describe its strategy for eliminating chronic homelessness by 2012, and its planned action steps for addressing the needs of persons that are chronically homeless. This can include barriers to achieving this and should include the jurisdiction's strategy for helping homeless persons make the transition to permanent housing and independent living.

A person that is considered chronically homeless is an unaccompanied homeless individual with a disabling condition who has either been continuously homeless for a year or more or has had at least four episodes of homelessness in the past three years. To

be considered chronically homeless, persons must have been sleeping in a place not meant for human habitation (e.g., living on the streets) and/or in an emergency shelter during that time. For the purposes of chronic homelessness, a disabling condition is a diagnosable substance use disorder, serious mental illness, developmental disability, or chronic physical illness or disability, including the co-occurrence of two or more of these conditions. A disabling condition limits an individual's ability to work or perform one or more activities of daily living.

Discharge Coordination Policy -- Every jurisdiction receiving McKinney-Vento Homeless Assistance Act Emergency Shelter Grant (ESG), Supportive Housing, Shelter Plus Care, or Section 8 SRO Program funds should develop and implement a "Discharge Coordination Policy, to the maximum extent practicable. Such a policy should include "policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent such discharge from immediately resulting in homelessness for such persons." The jurisdiction should describe its planned activities to implement a cohesive, community-wide Discharge Coordination Policy and how the community will move toward such a policy.

SPECIAL NEEDS POPULATIONS

Special Needs Populations -- The jurisdiction must estimate, to the extent practicable, the number of persons in various subpopulations that are not homeless but may require housing or supportive services, including the elderly, frail elderly, persons with disabilities (mental, physical, developmental, persons with HIV/AIDS and their families), persons with alcohol or other drug addiction, victims of domestic violence, and any other categories the jurisdiction may specify and describe their supportive housing needs. In addition, HOPWA recipients must identify the size and characteristics of the population with HIV/AIDS and their families that will be served in the metropolitan area.

The jurisdiction can use Table 1B of their Consolidated Plan to help identify these needs. The plan must also describe, to the extent information is available, facilities and services that assist persons who are not homeless but require supportive housing, and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing. If the jurisdiction plans to use HOME or other tenant based rental assistance to assist one or more of these subpopulations, it must justify the need for such assistance in the plan.

Priority Needs of Special Needs Populations -- Identify the priority housing and supportive service needs of persons who are not homeless but require supportive housing, i.e., elderly, frail elderly, persons with disabilities (mental, physical, developmental, persons with HIV/AIDS and their families), persons with alcohol or other drug addiction by using Table 1B.

Specific Objectives -- Identify specific objectives developed in accordance with the

statutory goals described in section 24 CFR 91.1 that the jurisdiction intends to initiate and/or complete in accordance with the priority needs tables prescribed by HUD, and how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan.

Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments and outcomes the jurisdiction hopes to achieve in quantitative terms over a specified time period (i.e., one, two, three, or more years), or in other measurable terms as identified and defined by the jurisdiction.

HOUSING

Housing Needs -- The jurisdiction must provide an estimate of housing needs projected for the next five-year period. This includes an estimate of the number and type of families in need of housing assistance for extremely low-income, low-income, moderate-income, and middle-income families, for renters and owners; and the specification of such needs for different categories of persons, including elderly persons, single persons, large families, public housing residents, families on the public housing and section 8 tenant-based waiting list, persons with HIV/AIDS and their families, victims of domestic violence, and persons with disabilities; and a discussion of specific housing problems, including cost-burden, severe cost- burden, substandard housing, and overcrowding (especially large families) compared to the jurisdiction as a whole.

Housing data included in this portion of the plan shall be based on U.S. Census data as provided by HUD and updated by any properly conducted local study, or any other reliable source that the jurisdiction clearly identifies. Jurisdictions may wish to refer to the CHAS data at: http://socds.huduser.org/scripts/odbic.exe/chas/index.htm in preparing their narrative. To the extent that any racial or ethnic group has a disproportionately greater need for any income category in comparison to the needs of that category as a whole, the jurisdiction must complete an assessment of that specific need. For this purpose, disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least ten percentage points higher than the percentage of persons in the category as a whole.

Priority Housing Needs -- The jurisdiction must describe the relationship between the allocation priorities and the extent of need given to each category of priority needs in accordance with the categories specified in Table 2A. These categories correspond with special tabulations of U.S. census data provided by HUD for the preparation of the Consolidated Plan. The jurisdiction must provide an analysis of how the characteristics of the housing market and the severity of housing problems and needs of each category of residents provided the rationale for establishing the allocation priorities and use of funds made available for each priority housing need category, particularly among extremely low-income, low-income, and moderate-income households. The plan should be explicit about what the jurisdiction plans to do with formula grant funds in the context of their

larger strategy. Family and income types may be grouped in the case of closely related categories of residents where the analysis would apply to more than one family or income type.

Market Analysis -- Based on information available to the jurisdiction the consolidated plan must describe the significant characteristics of the housing market in terms of supply, demand, condition, and the cost of housing; the housing stock available to serve persons with disabilities; and to serve persons with HIV/AIDS and their families. Data on the housing market should include, to the extent information is available, an estimate of the number of vacant or abandoned buildings and whether units in these buildings are suitable for rehabilitation. The jurisdiction must identify and describe any area of low-income concentration and any area of minority concentration either in a narrative or one or more maps, stating how it defines the terms "area of low-income concentration" and "area of minority concentration". The jurisdiction shall also include a description of its number and targeting (income level and type of household served) of units currently assisted by local, state, or federally funded programs, and an assessment of whether any such units are expected to be lost from the assisted housing inventory for any reason, (i.e. expiration of Section 8 contracts).

Specific Housing Objectives -- Each specific housing objective must be identified by number, contain proposed accomplishments and outcomes the jurisdiction hopes to achieve in quantitative terms over a specified time period (i.e., one, two, three, or more years), or in other measurable terms as identified and defined by the jurisdiction. Specific housing objectives must describe how funds that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan and separately indicate the number of extremely low-income, low-income, and moderate-income families assisted for whom it will provide affordable rental and homeownership housing with Federal funds over a specific time period according to the standards in section 215 of Title II of the National Affordable Housing Act of 1990, as amended.

The housing strategy must indicate how the characteristics of the housing market will influence the use of funds made available for rental assistance, production of new units, rehabilitation of old units, or acquisition of existing units. Please note, the goal of affordable housing is not met by beds in nursing homes. If the jurisdiction intends to use HOME funds for tenant-based rental assistance, it must specify local market conditions that led to the choice of that option.

Needs of Public Housing -- In cooperation with the public housing agency or agencies located within its boundaries, the plan must provide a concise summary of the needs of public housing, including identifying the public housing developments in the jurisdiction, the number of public housing units in the jurisdiction, the physical condition of such units, the restoration and revitalization needs of public housing projects within the jurisdiction, and other factors, including the number of families on public housing and tenant-based waiting lists and results from the Section 504 needs assessment of public

housing projects located within its boundaries (i. e. assessment of needs of tenants and applicants on waiting list for accessible units as required by 24 CFR 8.25). The public housing agency and jurisdiction can use optional Table 4 of the Consolidated Plan to identify priority public housing needs to assist in this process.

Public Housing Strategy -- Provide a concise summary of the public housing agency's strategy to serve the needs of extremely low-income, low-income, and moderate-income families residing in the jurisdiction served by the public housing agency (including families on the public housing and section 8 tenant-based waiting list), the public housing agency's strategy for addressing the revitalization and restoration needs of public housing projects within the jurisdiction and improving the management and operation of such public housing, and the public housing agency's strategy for improving the living environment of extremely low-income, low-income, and moderate families residing in public housing. The jurisdiction must also provide a concise summary of the manner in which the plan of the jurisdiction will help address the needs of public housing, including the need to increase the number of accessible units where required by a Section 504 Voluntary Compliance Agreement, and activities it will undertake to encourage public housing residents to become more involved in management and participate in homeownership. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation.

Lead-Based Paint Needs -- The jurisdiction must estimate the number of housing units that contain lead-based paint hazards, as defined in section 1004 of the Residential Lead-Based Paint Hazard Reduction Act of 1992, and are occupied by extremely low-income, low-income, and moderate-income families. Briefly describe the actions that will take place to evaluate and reduce the number of housing units containing lead-based paint hazards, how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards, and describe how lead based hazard reduction will be integrated into housing policies and programs.

Barriers to Affordable Housing -- This section requires the jurisdiction to explain whether the cost of housing or the incentives to develop, maintain, or improve affordable housing are affected by public policies, particularly those of the local jurisdiction. Such policies include tax policy affecting land and other property, land use controls, zoning ordinances, building codes, fees and charges, growth limits, and policies that affect the return on residential investment.

Identify the strategy to remove or ameliorate negative effects of public policies that serve as barriers to affordable housing, except that, if a State requires a unit of general local government to submit a regulatory barrier assessment that is substantially equivalent to the information required under this part, as determined by HUD, the unit of general local government may submit that assessment to HUD and it shall be considered to have complied with this requirement.

Fair Housing -- The jurisdictions were required to complete an analysis of impediments to fair housing choice within one year of the effective date of the consolidated plan rule (February 6, 1995). The analysis was not required to be submitted as part of the consolidated plan, but the jurisdiction must certify that it completed the analysis, is taking appropriate actions to overcome the effects of any impediments identified through that analysis, and maintains records reflecting the analysis and actions in this regard.

Antipoverty Strategy -- Provide a summary of the jurisdiction's goals, programs, and policies for reducing the number of poverty level families (as defined by the Office of Management and Budget and revised annually). In consultation with other appropriate public and private agencies, (i.e. TANF agency) state how the jurisdiction's goals, programs, and policies for producing and preserving affordable housing set forth in the housing component of the consolidated plan will be coordinated with other programs and services for which the jurisdiction is responsible. In addition, the jurisdiction must identify the extent to which this strategy will reduce (or assist in reducing) the number of poverty level families, taking into consideration factors over which it has control.

Monitoring -- Describe the standards and procedures it will use to monitor its housing and community development activities and ensure long-term compliance with program requirements and comprehensive planning requirements.

COMMUNITY DEVELOPMENT

Priority Non-housing Community Development Needs -- Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in Table 2B, (i.e., public facilities, public improvements, public services and economic development).

Community Development Objectives -- Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low-and moderate-income persons.

Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments and outcomes the jurisdiction hopes to achieve in quantitative terms over a specified time period (i.e., one, two, three, or more years), or in other measurable terms as identified and defined by the jurisdiction.

Guidance:

Strategic Vision for Change -- If the jurisdiction is developing a long-term program for significant change in its community, has it engaged in a process that will develop a

comprehensive vision of its desired future? How does the vision make the community and its target neighborhoods more livable, better functioning, and more attractive? Does it integrate economic, physical, environmental, community, and human development in a comprehensive and coordinated fashion so that families and communities can work together and thrive? Does it improve the availability/accessibility, affordability, sustainability of decent housing, a suitable living environment, or expand economic opportunity?

Barriers to Affordable Housing -- The removal of regulatory barriers to affordable housing has also become a top Administration priority resulting in the creation of the America's Affordable Communities Initiative and a Regulatory Barriers Clearinghouse for sharing ideas on barrier removal. More information about America's Affordable Communities Initiative is available at www.hud.gov/affordablecommunities. The Regulatory Barriers Clearinghouse is available at: http://regbarriers.org. HUD Form 27300, used for competitive grants, can serve as a useful guidance document in assisting jurisdictions identify the specific policies, procedures or process that impact the cost of developing, maintaining or improving affordable housing.

Neighborhood Revitalization Strategy Areas -- Jurisdictions are strongly encouraged to develop neighborhood revitalization strategies that include outcomes that measure the economic empowerment of low- and moderate-income persons, increases in homeownership and property values. Jurisdictions may, upon HUD approval of the strategy, obtain greater flexibility in the use of CDBG funds in the revitalization area(s). See Attachment for instructions on qualifying neighborhood revitalization strategy areas.

Specific Housing Objectives -- Jurisdictions are encouraged to identify specific housing objectives that promote the availability/accessibility, affordability, and sustainability of housing through activities involving the production of new units, the rehabilitation of existing units, the acquisition of existing units, rental assistance, and homebuyer assistance. Jurisdictions are also encouraged to identify specific objectives for increasing minority homeownership.

Identifying Benchmarks -- Benchmarks establish specific targets on the road to achieving goals and carrying out strategies. They are essential for purposes of accountability and measuring success. A benchmark charts the progress from the baseline of the present condition to the achievement of the goal. For example, a community may identify the revitalization of a certain neighborhood as part of its vision, and may include proposed performance measures related to reduction in crime rates, increase in property values, education attainment, or infant mortality rates. Progress towards these goals could be tracked in terms that measure outcomes as well as process and outputs. In this way, the grantee and its citizens would know if the selected activities and strategies are achieving the desired outcome, i.e. a revitalized neighborhood.

Public Housing -- Has the jurisdiction provided examples of supportive efforts to revitalize neighborhoods surrounding public housing projects (either current or

proposed); cooperation in the provision of resident programs and services; coordination of local drug elimination or anti-crime strategies; upgrading of police, fire, schools, and other services; and economic development activities in or near public housing projects that expand economic opportunity or tie in with self-sufficiency efforts for residents.

Mapping Data -- Has the jurisdiction mapped the data to identify the geographic areas in which concentrations of various housing needs, community development needs and homeless needs and facilities overlap? Similarly, has the jurisdiction mapped the location of essential human services, recreational activities and other amenities to help illustrate whether existing services and facilities are convenient and accessible to various populations?

Metropolitan/Regional Connections -- Clear connections should be established between communities, neighborhoods, and the larger metropolitan region. Does the jurisdiction's strategic plan connect its actions to the larger economic strategies for the metropolitan region? Does the plan reference the plans of other agencies that have responsibilities for metropolitan economic development, transportation, and workforce investment?

Needs of Special Populations -- Does the strategy include efforts to provide housing or supportive services for persons with special needs, such as the elderly, frail elderly, persons with severe mental illness, the developmentally disabled, physically disabled, persons with alcohol or other drug addiction, or persons with HIV/AIDS and their families?

III. Consolidated Action Plan

In this section, the jurisdiction must provide a concise summary of the actions, activities, and programs that will take place during the next year to address the priority needs and specific objectives identified by the strategic plan. The action plan, that is submitted annually, must identify the linkage between the use of federal resources and the specific objectives developed to address priority needs identified in the strategic plan. This can be demonstrated by listing the activity under each specific objective, identifying the activity numbers that support each specific objective, or by identifying the specific objective the activity supports. The grantees are required to identify all programs and identify all resources during that particular program year. Tables 3C contains a tabular format for listing the projects that will take place during the program year.

Submission Requirements:

Action Plan Elements

A. Standard Form 424

- **B. Executive Summary** -- a clear, concise executive summary that included the objectives and outcomes identified in the plan and an evaluation of past performance; a summary of the citizen participation and consultation process, a summary of citizen comments or views on the plan, a summary of comments or views not accepted, and the reasons why they were not accepted.
- C. Sources of Funds -- Identify the private and public resources the jurisdiction expects to receive to address priority needs and specific objectives identified in the strategic plan. The plan must provide a concise summary of the amounts allocated under HUD formula grant programs, program income the jurisdiction expects to receive during the program year, and proceeds from Section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in its strategic plan. The plan should include Section 8 funds made available to jurisdictions and Low-Income Housing Tax Credits. For homeless programs, include the McKinney-Vento Homeless Assistance Act programs, other special federal, State and local and private funds targeted to homeless individuals and families, and persons that are chronically homeless. The jurisdiction must explain how federal funds will leverage resources from private and non-federal public sources, and a description of how matching requirements of HUD programs will be satisfied. Where the jurisdiction deems it appropriate, it may indicate publicly owned land or property located within the jurisdiction that may be used to carry out the plan.
- **D. Statement of Specific Annual Objectives --** The jurisdiction's action plan must contain a summary of the priorities and specific annual objectives to be addressed by the end of the program year. Each specific objective developed to address a priority need must be identified by number, contain proposed accomplishments and outcomes the jurisdiction hopes to achieve in quantitative terms during the specified time period, or in other measurable terms as identified and defined by the jurisdiction. Jurisdictions are encouraged to identify specific annual objectives under general outcome and objective categories involving the availability/accessibility, affordability, and sustainability of decent housing, a suitable living environment, and economic opportunity using optional Table 3A. If this table is not used, jurisdictions must provide comparable information that is required by the consolidated plan regulation.
- **E. Description of Activities --** The action plan must provide a concise summary of the eligible programs or activities that will take place during the program year to address the priority needs and specific objectives identified in the strategic plan. The description of programs or activities shall estimate the number and type of families (including income level) that will benefit from the proposed use of funds, and identify the specific local objectives and priority needs that will be addressed. The action plan must also indicate the number and type of proposed accomplishments the jurisdiction hopes to achieve and a target date for completion of the activity. This information must be presented in accordance with the instructions for Table 3C.
- **F. Outcome Measures --** The action plan must provide outcome measures for activities

- included in its action plan in accordance with the Federal Register Notice, dated March 7, 2006, i.e., general objective category (decent housing, suitable living environment, economic opportunity) and general outcome category (availability/accessibility, affordability, sustainability).
- **G.** Allocation Priorities and Geographic Distribution -- The action plan must describe the reasons for the allocation priorities, identify the geographic areas of the jurisdiction (including areas of low-income and minority concentration) in which it will direct assistance during the program year, and identify any obstacles to addressing underserved needs. Where appropriate, jurisdictions should also estimate the percentage of funds the jurisdiction plans to dedicate to target areas.
- **H. Annual Affordable Housing Goals --** The action plan must specify one-year goals for the number of homeless, non-homeless, and special-needs households to be provided affordable housing using funds made available to the jurisdiction, and one-year goals for the number of households to be provided affordable housing through activities that provide rental assistance, production of new units, rehabilitation of existing units, or acquisition of existing units using funds made available to the jurisdiction. The term affordable housing shall be as defined in 24 CFR 92.252 for rental housing and 24 CFR 92.254 for homeownership. Jurisdictions are encouraged to identify annual housing goals using optional Table 3B. If this table is not used, jurisdictions must provide comparable information that is required by the consolidated plan regulation.
- I. Homeless and Other Special Populations -- The jurisdiction must identify the activities to address emergency shelter and transitional housing needs of homeless individuals and homeless families with children (including the subpopulations), to prevent low-income individuals and families with children (especially extremely low-income) from becoming homeless, to help homeless persons (especially persons that are chronically homeless) make the transition to permanent housing and independent living, and specific action steps to end chronic homelessness. The jurisdiction must also identify activities to address the special needs of persons who are not homeless but require supportive services, such as persons with disabilities and persons living with HIV/AIDS and their families (required for HOPWA recipients).
- **J. Needs of Public Housing --** The jurisdiction must identify the manner in which the plan of the jurisdiction will address the needs of public housing during the program year. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance to improve the operations of the public housing agency to remove such designation.
- **K.** Antipoverty Strategy -- Briefly describe the actions it plans to take during the next year to reduce the number of poverty level families (as defined by the Office of Management and Budget and revised annually), taking into consideration factors over which the jurisdiction has control.

- **L. Lead-Based Paint Hazards --** Briefly describe the actions that will take place during the next year to evaluate and reduce the number of housing units containing lead-based paint hazards in order to increase the inventory of lead-safe housing available to extremely low-income, low-income, and moderate-income families, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.
- **M. Other Actions --** The jurisdiction must briefly describe actions that will take place during the next year to address obstacles to meeting underserved needs, foster and maintain affordable housing, remove barriers to affordable housing, develop institutional structure, enhance coordination between public and private housing, health, and social service agencies, encourage public housing residents to become more involved in management and participate in homeownership.
- **N.** Citizen Participation The jurisdiction must include a summary of the citizen participation and consultation process, (including efforts made to broaden public participation), a summary of comments or views, and a summary of any comments or views not accepted and the reasons why they were not accepted.
- **O.** Certifications The jurisdiction must include the applicable certifications required by 24 CFR 91.225 and 91.425 signed by the authorized official.
- **P. Monitoring --** The jurisdiction must briefly describe actions that will take place during the next year to monitor its housing and community development activities and to ensure long-term compliance with program requirements, including minority business outreach and comprehensive planning requirements. Program requirements include appropriate regulations and statutes of the programs involved, including steps being taken to review affordable housing activities, ensure timeliness of expenditures, on-site inspections it plans to determine compliance with housing codes, and actions to be taken to monitor its subrecipients.

Specific CDBG Submission Requirements:

Sources of Funds -- CDBG resources must include the following in addition to the annual grant:

- 1. Program income expected to be received during the program year, including:
- (a) the amount expected to be generated by and deposited to revolving loan funds;
- (b) the total amount expected to be received from each new float-funded activity included in this plan; and
- (c) the amount expected to be received during the current program year from a float-funded activity described in a prior statement or plan.

NOTE: Amounts described in a prior statement or plan are not to be included in the amount programmed for use in the current plan as they were programmed for use in the statement or plan that first included the float-funded activity generating them.

- 2. Program income received in the preceding program year that has not been included in a statement or plan;
- 3. Proceeds from Section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in its strategic plan.
- 4. Surplus funds from any urban renewal settlement for community development and housing activities; and
- 5. Any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.

Float-funded activities -- If a jurisdiction intends to carry out a new CDBG float-funded activity, the jurisdiction's plan must include the following information:

- 1. For the program income included in 1(b) above, the jurisdiction should identify the month(s) and year(s) in which the program income will be received; and which of the following options it will take for each float-funded activity to address the risk that the activity may fail to generate adequate program income:
 - (i) amend or delete activities in an amount equal to any amount due from default or failure to produce sufficient income in a timely manner. (If this option is chosen, the action plan must include a description of the process it will use to select activities to be amended or deleted and how it will involve citizens in that process), OR
 - (ii) obtain an irrevocable line of credit from a commercial lender for the full amount of the float-funded activity. (If this option is chosen, information on the float-funded activity in the action plan must include the lender and the terms of the irrevocable line of credit), OR
 - (iii) agree to transfer general local government funds to the CDBG line of credit in the full amount of any default or shortfall within 30 days of the float-funded activity's failure to generate projected program income on schedule.
- 2. For each float-funded activity for which program income is included in 1(c) under Sources of Funds above, the jurisdiction must identify the prior statement or plan in which the planned use has already been described.

Program Benefit and Location -- The plan shall identify the estimated amount of CDBG funds that will be used for activities that benefit persons of low- and moderate-income. The

information about activities in the action plan must be identified in sufficient detail, including geographic location if available, to allow citizens to determine the degree to which they may be affected. If the location of a specific activity is not known or is confidential, the jurisdiction should identify the general area or activity. For activity for which the jurisdiction has not yet decided on a specific location, such as when the jurisdiction is allocating an amount of funds to be used for making loans or grants to businesses or for residential rehabilitation, the description shall identify who may apply for the assistance, the process by which the grantee expects to select who will receive the assistance (including selection criteria), and how much and under what terms the assistance will be provided.

Contingency -- A jurisdiction must identify activities planned with respect to all CDBG funds expected to be available during the program year, except that an amount generally not to exceed ten percent of such total available CDBG funds may be excluded from the funds for which eligible activities are described if it has been identified as a contingency for cost overruns.

Urgent needs -- An "urgent need" activity may be included in the action plan only if the jurisdiction certifies that the activity is designed to meet other community development needs having a particular urgency because existing conditions pose a serious and imminent threat to the health or welfare of the community and other financial resources are not available.

Specific HOME Submission Requirements:

Resale/Recapture Provisions -- For homeownership activities, the participating jurisdiction must describe its resale or recapture guidelines that ensure the affordability of units acquired with HOME and/or American Dream Downpayment Initiative funds. See 24 CFR 92.254(a)(4).

HOME Tenant-Based Rental Assistance -- The participating jurisdiction must describe the local market conditions that led to the use of a HOME funds for tenant based rental assistance program. If the tenant based rental assistance program is targeted to or provides a preference for a special needs group, that group must be identified in the Consolidated Plan as having an unmet need and show the preference is needed to narrow the gap in benefits and services received by this population.

Other Forms of Investment -- If a participating jurisdiction intends to use forms of investment other than those described in 24 CFR 92.205(b), the jurisdiction must describe these forms of investment.

Affirmative Marketing -- The participating jurisdiction must describe the policy and procedures it will follow to affirmatively market housing containing five or more HOME-assisted units. (See 24 CFR 92.351(a)).

Minority/Women's Business Outreach – The participating jurisdiction must describe actions taken to establish and oversee a minority outreach program within its jurisdiction to ensure inclusion, to the maximum extent possible, of minority and women, and entities

owned by minorities and women, including without limitation, real estate firms, construction firms, appraisal firms, management firms, financial institutions, investment banking firms, underwriters, accountants, and providers of legal services, in all contracts, entered into by the participating jurisdiction with such persons or entities, public and private, in order to facilitate the activities of the participating jurisdiction to provide affordable housing under the HOME program or any other Federal housing law applicable to such jurisdiction. (See 24 CFR 92.351.(b))

Refinancing – If a jurisdiction intends to use HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds, it must state its financing guidelines required under 24 CFR 92.206(b).

American Dream Downpayment Initiative – If a jurisdiction intends to use American Dream Downpayment Initiative (ADDI) funds to increase access to homeownership, it must provide the following information:

- (1) a description of the planned use of the ADDI funds;
- (2) a plan for conducting targeted outreach to residents and tenants of public and manufactured housing and to other families assisted by public housing agencies, for the purposes of ensuring that the ADDI funds are used to provide downpayment assistance for such residents, tenants, and families; and
- (3) a description of the actions to be taken to ensure the suitability of families receiving ADDI funds to undertake and maintain homeownership, such as provision of housing counseling to homebuyers.

Minority Homeownership – HUD has established a national goal to increase the number of minority homeowners by 5.5 million by 2010. Since HOME and ADDI are important components of this effort, jurisdictions are now required to include in their Consolidated Plan submissions, an estimate of the total number of minority households expected to be assisted in becoming homeowners during the period covered by the Consolidated Plan. It will not be necessary to establish separate Consolidated Plan goals for HOME and ADDI for homebuyer assistance. A single set of goals may be provided, since by regulation and for Consolidated Plan purposes, ADDI is considered as part of the HOME program.

Specific ESG Submission Requirements:

The jurisdiction must briefly describe the process and criteria for awarding its grant funds along with the source and amount of matching funds.

Specific HOPWA Submission Requirements:

A city applicant for an EMSA must briefly describe how the proposed activities will be

used to meet the urgent needs of persons with HIV/AIDS and their families that are not being addressed by public and private resources within the metropolitan area, the public and private resources expected to be made available in connection with the proposed activities being funded, and the method of selecting project sponsors (including providing full access to grassroots faith-based and other community organizations) for activities in the metropolitan area, including areas not within the boundaries of the applicant city.

HIV/AIDS Housing Goals -- Jurisdictions receiving HOPWA funds must identify annual goals for the number of households to be provided with housing through activities that provide short-term rent, mortgage and utility assistance payments to prevent homelessness of the individual or family, tenant-based rental assistance; and units provided in housing facilities that are being developed, leased or operated. See CAPER charts at: http://www.hud.gov/offices/cpd/aidshousing/programs/2006reportingreqs.cfm for a useful guidance document that helps jurisdictions identify and track outputs and outcomes.

Guidance:

Impediments to Fair Housing Choice -- As part of the certification to affirmatively further fair housing, jurisdictions are required to complete an analysis of impediments to fair housing choice and to take actions to overcome the effects of any impediments identified through that analysis. Jurisdictions may include actions the jurisdiction plans to take to overcome the effects of any impediments identified through that analysis in the annual action plan submission.

Performance Measurement Systems -- In addition to outputs, jurisdictions are strongly encouraged to develop performance measurement systems that contain proposed and actual outcomes. See CPD Notice 03-09 and the Federal Register Notice, dated March 7, 2006, for guidance regarding performance measurement systems.

Neighborhood Strategy Areas -- Studies indicate concentrated investments have a greater impact neighborhood stabilization and revitalization. Jurisdictions are encouraged to identify geographic areas where the jurisdiction will concentrate the use block grant funds and other local actions in a coordinated manner to achieve local objectives and desired outcomes, i.e., increased homeownership and property values, reduction in crime rates, code enforcement, etc.

Priority Needs Summary Tables

General Information:

These tables are to be used to identify the priority (including the relative priority where required) to be given to each category of needs for the period of time designated in the strategic plan portion of this document.

Table 1A Homeless Gap Analysis and Homeless Population/Subpopulation Chart Instructions

A jurisdiction must provide a complete description of the sources and methods used to generate the data addressing, where appropriate, the following: (a) when the study was conducted; (b) who did the study; (c) the study's purpose(s); (d) geographical area(s) covered; (e) time period of data collection (e.g., one night, over a week's time); (f) locations included (shelter-type facilities, service facilities, non-facility locations, such as streets, parks); and (g) corrections made for possible duplicate counting.

If the jurisdiction is unsure about whether its counting methods meet HUD's standards, it may contact the local Office of Community Planning and Development.

Continuum of Care Housing Gap Analysis Chart:

This required chart represents the need for additional emergency, transitional housing and permanent supportive housing resources. The estimated unmet need is based upon the status of the inventory at a point-in-time (one-day) and takes into account both existing beds and <u>funded</u> new beds that are not yet ready for occupancy but are under development.

Current Inventory: Enter the number of existing beds currently serving the community. This includes only beds currently available for occupancy.

Under Development: Enter the number of funded beds not ready for occupancy but under development.

Unmet Need/Gap: Enter the number of beds determined to be the unmet need for each category.

Continuum of Care Homeless Population and Subpopulation Chart:

Completing Part 1: Homeless Population. This required chart must be completed using statistically reliable, unduplicated counts or estimates of homeless persons in sheltered and unsheltered locations at a one-day point in time. The counts must be from: (A) administrative records, (N) enumerations, (S) statistically reliable samples, or (E) estimates. The quality of the data presented in each box must be identified as: (A), (N), (S) or (E).

Completing Part 2: Homeless Subpopulations. This must be completed using statistically reliable, unduplicated counts or estimates of homeless persons in sheltered and unsheltered locations at a one-day point in time. The numbers must be from: (A) administrative records, (N) enumerations, (S) statistically reliable samples, or (E) estimates. The quality of the data presented in each box must be identified as: (A), (N), (S) or (E).

Sheltered Homeless. Count adults, children and youth residing in shelters for the homeless. "Shelters" include all emergency shelters and transitional shelters for the homeless, including domestic violence shelters, residential programs for runaway/homeless youth, and any hotel/motel/apartment voucher arrangements paid by a public/private agency because the person or family is homeless. **Do not count:** (1) persons who are living doubled up in conventional housing; (2) formerly homeless persons who are residing in Section 8 SRO, Shelter Plus Care, SHP permanent housing or other permanent housing units; (3) children or youth, who because of their own or a parent's homelessness or abandonment, now reside temporarily and for a short anticipated duration in hospitals, residential treatment facilities, emergency foster care, detention facilities and the like; and (4) adults living in mental health facilities, chemical dependency facilities, or criminal justice facilities.

Unsheltered Homeless. Count adults, children and youth sleeping in places not meant for human habitation. Places not meant for human habitation include streets, parks, alleys, parking ramps, parts of the highway system, transportation depots and other parts of transportation systems (e.g. subway tunnels, railroad car), all-night commercial establishments (e.g. movie theaters, laundromats, restaurants), abandoned buildings, building roofs or stairwells, chicken coops and other farm outbuildings, caves, campgrounds, vehicles, and other similar places.

Table 1B Special Needs (Non-Homeless) Populations

General Instructions:

To the degree practicable, give your best estimate of the unmet needs of special need populations for each sub-populations of the non-homeless persons during the time designated in the strategic plan. In addition to the listed sub-populations you can add other groups in need.

Priority Need Level Column: Choose the priority for allocating investment to each category of housing need (if any). Designation of the relative priority is optional. If the following definitions of "high", "medium", and "low" priority are not used, please describe the manner in which the priorities for allocating investment are identified. For example, you can indicate a priority with a check mark, a "Y" for "Yes", a "N" for "No".

<u>Unmet Priority Need:</u> To the degree practicable, jurisdictions should enter the best estimate of the unmet need for supportive housing or services. Data may be calculated from administrative record keeping, enumerations, statistically reliable samples, or other sources.

Estimated \$ Column: To the degree practicable, jurisdictions should enter the estimated dollar amount required to properly address the need.

Goals: Enter the 3-5 year goals and annual goals identifying the non-homeless number of people with special needs the jurisdiction expects to serve during the period of time designated in the strategic plan component of this document.

Line item instructions:

Elderly: Enter the best estimate of unmet need and the estimated dollar amount required to address the needs of elderly persons that are not homeless but need supportive housing or services.

Frail Elderly: Enter the best estimate of unmet need and the estimated dollar amount required to address the needs of frail elderly persons that are not homeless but need supportive housing or services.

Severe mental illness only: Enter the best estimate of unmet need and the estimated dollar amount required to address the needs of severe mentally ill persons that are not homeless but need supportive housing or services.

Developmentally disabled: Enter the best estimate of unmet need and estimated dollar amount required to address the needs of developmentally disabled persons that are not homeless but need supportive housing or services.

Physically disabled: Enter the best estimate of unmet need and estimated dollar amount required to address the needs of physically disabled persons that are not homeless but need supportive housing or services.

<u>Alcohol/other drug addiction only:</u> Enter the best estimate of unmet need and estimated dollar amount required to address the needs of persons with alcohol/other drug addiction that are not homeless but need supportive housing or services.

HIV/AIDS: Enter the best estimate of unmet need and estimated dollar amount required to address the needs of persons with HIV/AIDS that are not homeless but need supportive housing or services. (This is required for HOPWA recipients.)

<u>Victims of Domestic Violence:</u> Enter the best estimate of unmet need and estimated dollar amount required to address the needs of victims of domestic homeless that are not homeless but need supportive housing or services.

Other: Specify by entering the description, priority need level and estimated dollar amount.

Table 1C Summary of Specific Multi-Year Objectives Homeless and Special Needs

Specific Objective #: Identify each specific multi-year objective with a unique number. For example, DH-1.1, DH-1.2, DH-1.3 for specific objectives that correspond with the category availability/accessibility of decent housing.

Specific Objectives: Identify the specific, measurable objective(s) under each general outcome/objective category. List specific objectives that are supported by the use of CPD formula grant funds separate from those that are not supported by the use of CPD formula grant funds. Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments and outcomes the jurisdiction hopes to achieve in quantitative terms over a specific timeframe, or in other measurable terms as identified and defined by the jurisdiction.

Sources of Funds: Identify the sources of funds that will be used to achieve the stated specific objective during the period covered by the strategic plan.

Performance Indicator: Enter the performance indicator that most closely describes the type of accomplishment and the most appropriate measure of that accomplishment. The performance indicator should be a reasonable projection of what will be accomplished during the period designated for the specific objective. Jurisdictions are encouraged to use specific outcome indicators contained in the Federal Register Outcome Performance Measurement Notice, dated March 7, 2006.

Expected Number: Enter the number of the item indicated under Performance Indicator that the jurisdiction expects will be accomplished during the period designated for the specific objective.

Actual Number: Enter the number of the item indicated under Performance Indicator that the jurisdiction actually accomplished during the time period of time designated for the specific objective. (This is for performance reporting purposes.)

Outcome/Objective: Identify the outcome/objective category in the following manner:

	Availability/Accessibility	Affordability	Sustainability
Decent Housing	DH-1	DH-2	DH-3
Suitable Living Environment	SL-1	SL-2	SL-3
Economic Opportunity	EO-1	EO-2	EO-3

Table 2A Priority Housing Needs and Activities

The priority housing needs assessment shall be based on data available from the U.S. Census, as updated by a properly conducted local study or any other reliable source that the jurisdiction

must clearly identify, and should reflect the required consultation with social service and public housing agencies regarding the housing needs of children, elderly persons, persons with disabilities, homeless persons, and other persons served by such agencies, and the citizen participation process. In establishing five-year allocation priorities, the unit of general local government should identify not only the various categories of low-income households that will have a priority for allocation of funds, but also the type of activities that would best meet the identified needs of households.

Definitions

Assisted Household - For the purpose of identification of priority needs, goals, and specific objectives, an assisted household is one that will receive benefits through the investment of Federal funds, either alone or in conjunction with the investment of other public or private funds. (The program funds providing the benefit(s) may be from any funding year or combined funding years.) A renter is benefited if the household or person takes occupancy of affordable housing that is newly acquired (standard housing), newly rehabilitated, or newly constructed, and/or receives rental assistance through new budget authority. An existing homeowner is benefited if the home's rehabilitation is completed. A homebuyer is benefited if a home is purchased during the year. Households that will benefit from more than one program (e.g. a renter who receives rental assistance while occupying newly rehabilitated housing) must be counted only once. To be included, the household's housing unit must, at a minimum, satisfy the HUD Section 8 Housing Quality Standards (see, e.g. 24 CFR 882.109).

Section 215 Affordable Housing

1. **Rental Housing:** A rental housing unit is considered to be an affordable housing unit if it is occupied by a extremely low-income, low-income, or moderate-income family or individual and bears a rent that is the lesser of (1) the Existing Section 8 Fair Market Rent for comparable units in the area or, (2) 30 percent of the adjusted income of a family whose income equals 65 percent of the median income for the area, except that HUD may establish income ceilings higher or lower than 65 percent of the median income because of prevailing levels of construction costs or fair market rents, or unusually high or low family incomes.

2. Homeownership:

- (a) Housing that is for purchase (with or without rehabilitation) qualifies as affordable housing if it (1) is purchased by a extremely low-income, low-income, or moderate-income first-time homebuyer who will make the housing his or her principal residence; and (2) has a sale price that does not exceed the mortgage limit for the type of single family housing for the area under HUD's single family insuring authority under the National Housing Act.
- (b) Housing that is to be rehabilitated, but is already owned by a family when assistance is provided, qualifies as affordable housing if the housing (1) is occupied by a extremely low-income, low-income, or moderate-income family which uses the house as its principal residence, and (2) has a value, after rehabilitation, that does not exceed the

mortgage limit for the type of single family housing for the area, as described in (a) above.

Table 2A -- Priority Housing Needs Specific Instructions

Small Related: A household of 2 to 4 persons that includes at least one person related to the householder by blood, marriage, or adoption.

Large Related: A household of 5 or more persons that includes at least one person related to the householder by blood, marriage, or adoption.

Elderly: A one or two person household in which the head of the household or spouse is at least 62 years of age.

Special Needs Populations: A household of one or more persons that includes persons that have mobility impairments or disabilities, (i.e., mental, physical, developmental, persons with HIV/AIDS and their families), victims of domestic violence, persons with alcohol or other drug addiction, or other special needs populations that may require housing or supportive services.

Other: A household of one or more persons that does not meet the definition of a small related, large related, elderly, or special needs population household. This category includes all households with only unrelated individuals present except those qualifying as elderly or special needs population households.

(MFI) Median Family Income:

0-30%: Subgroup with incomes of 0 to 30% of HUD-adjusted MFI for the area.

31-50%: Subgroup with income of 31 to 50% of HUD-adjusted MFI for the area.

51-80%: Subgroup with income of 51 to 80% of HUD-adjusted MFI for the area.

Priority Need Level Column: Choose the priority for allocating investment to each category of the housing need (if any). Designation of the relative priority is optional. If the following definitions of "high", "medium", and "low" priority are not used, please describe the manner in which the priorities for allocating investment are identified. For example, you can indicate a priority for allocating investments with a check mark, a "Y" for "Yes", a "N" for "No".

High Priority: Activities to address this unmet need will be funded by the locality with federal funds, either alone or in conjunction with the investment of other public or private funds during the period of time designated in the strategy portion of this document.

Medium Priority: If funds are available, activities to address this unmet need may be funded by the locality with federal funds, either alone or in conjunction with the investment of other public or private funds during the period of time designated in the strategy portion of this

document. Also, the locality will take other actions to help this group locate other sources of funds.

Low Priority: The locality will not fund activities to address this unmet need during the period of time designated in the strategy portion of this document. The locality will consider certifications of consistency for other entities' applications for Federal assistance.

<u>Unmet Need:</u> Enter the estimated number of eligible households in need of assistance for the ensuing five-year period that are not currently receiving assistance. This number is the unmet need.

Goals: For each of the categories of residents and tenure type, enter the 3-5 year goal and annual goals identifying the number of households to be assisted with housing using funding from all sources during the period of time designated in the strategic plan.

Total Goals: Enter the total number of households to be assisted with housing during the period of time designated in the strategy portion of this document.

Total Section 215 Goals: Enter the total number of households to whom the jurisdiction will provide affordable housing meeting the Section 215 criteria during the period of time designated in the strategy portion of this document using funds made available.

Total Section 215 Renter Goals: Enter the total number of renter households the jurisdiction will provide affordable rental housing meeting the Section 215 criteria during the period designated in the strategy portion of this document using funds made available.

Total Section 215 Owner Goals: Enter the total number of owner households the jurisdiction will provide affordable homeownership housing meeting the Section 215 criteria during the period of time designated in the strategy portion of this document using funds made available.

Table 2A -- Priority Housing Activities Specific Instructions

Priority: Choose the priority for allocating investment to each category of the housing activity. Designation of the relative priority is optional. If the following definitions of "high", "medium", and "low" priority are not used, please describe the manner in which the priorities for allocating investment are identified. For example, you can indicate a priority for allocating investments with a check mark, a "Y" for "Yes", a "N" for "No".

CDBG

Goals: For each category of activities, enter the 3-5 year goal and annual goals identifying the number of households to be assisted with completed housing units that are considered affordable (using local definitions of affordability) housing using CDBG funding during the period of time designated in the strategic plan.

HOME

Goals: For each category of activities, enter the 3-5 year goal and annual goals identifying the number of households to be assisted with completed housing units that are considered affordable housing (meeting the HOME definitions of affordability) using HOME funding during the period of time designated in the strategic plan.

HOPWA

Goals: For each category of activities, enter the 3-5 year goal and annual goals identifying the number of households to be assisted with housing units that are considered affordable housing (using local definitions of affordability) or services using HOPWA funding during the period of time designated in the strategic plan.

Table 2B Priority Community Development Needs

General Information

The needs listed in this section are non-housing community development needs. You should identify all priority unmet public facility, infrastructure, public service, anti-crime, youth, senior program, economic development, planning, and other non-housing community development needs that your community either currently has or will have over the period of time designated in the strategic plan component of this document. This should reflect the results of the citizen participation process and the required consultation with adjacent units of local government.

Priority Need Level Column: Choose the priority for allocating investment to each category of the housing need (if any). Designation of the relative priority is optional. If the following definitions of "high", "medium", and "low" priority are not used, please describe the manner in which the priorities for allocating investment are identified. For example, you can indicate a priority for allocating investments with a check mark, a "Y" for "Yes", a "N" for "No".

<u>High Priority:</u> The jurisdiction plans to use funds made available for activities that address this unmet need during the period of time designated in the strategic plan.

Medium Priority: If funds are available, activities to address this unmet need may be funded by the locality during the period of time designated in the strategic plan. Also, the locality will take other actions to help this group locate other sources of funds.

Low Priority: The jurisdiction does not plan to use funds made available for activities to address this unmet need during the period of time designated in the strategic plan. The jurisdiction will consider certifications of consistency for other entities' applications for Federal assistance.

No Such Need: The jurisdiction finds there is no need or the jurisdiction shows that this

need is already substantially addressed.

Unmet Priority Need: This is an optional field. Should you use it, enter the estimated number of units of measure for each unmet priority non-housing community development need identified in the community for the ensuing five-year period designated in the strategic plan, regardless of whether adequate funds (public and private) are available to address the identified priority need. For public facilities and improvements indicate the number of activities needing assistance that the community considers a priority. For public services, indicate the estimated number of people needing assistance that the community considers a priority. For economic development needs, indicate the number of businesses or activities that community considers a priority.

Dollars to Address Unmet Priority Need: This is an optional field. Enter the estimated expenditure needed (in current dollars) to address the priority non-housing community development needs the jurisdiction either currently has or will have over the period of time designated in the strategic plan. Include all funds (public and private) that would be needed to address the priority needs.

Goals: This is an optional field. Should you use it, enter the 3-5 year and annual community development goals the jurisdiction expects to achieve during the period of time designated in the strategic plan component of this document using funds made available. For public facilities and improvements, indicate the number of activities. For public services, indicate the number of people to be served. For economic development needs, indicate the number of activities or businesses to be assisted or the number of jobs that will be created/retained.

Table 2C Summary of Specific Multi-Year Objectives Housing and Community Development

Specific Objective #: Identify each specific multi-year objective with a unique number. For example, DH-1.1, DH-1.2, DH-1.3 for specific objectives under the category that correspond with availability/accessibility of decent housing.

Specific Objectives: Identify the specific, measurable objective(s) under each general outcome/objective category. List specific objectives that are supported by the use of CPD formula grant funds separate from those that are not supported by the use of CPD formula grant funds. Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments and outcomes the jurisdiction hopes to achieve in quantitative terms over a specific timeframe, or in other measurable terms as identified and defined by the jurisdiction.

Sources of Funds: Identify the sources of funds that will be used to achieve the stated specific objective during the period covered by the strategic plan.

Performance Indicator: Enter the performance indicator that most closely describes the type of accomplishment and the most appropriate measure of that accomplishment. The performance

indicator should be a reasonable projection of what will be accomplished during the period designated for the specific objective. Jurisdictions are encouraged to use specific outcome indicators contained in the Federal Register Outcome Performance Measurement Notice, dated March 7, 2006.

Expected Number: Enter the number of the item indicated under Performance Indicator that the jurisdiction expects will be accomplished during the period designated for the objective.

Actual Number: Enter the number of the item indicated under Performance Indicator that the jurisdiction actually accomplished during the time period of time designated for the objective. (This is for performance reporting purposes.)

Outcome/Objective: Identify the outcome/objective category in the following manner:

	Availability/Accessibility	Affordability	Sustainability
Decent Housing	DH-1	DH-2	DH-3
Suitable Living Environment	SL-1	SL-2	SL-3
Economic Opportunity	EO-1	EO-2	EO-3

Table 3A Summary of Specific Annual Objectives

Specific Objective #: Identify each specific annual objective with a unique number. For example, DH-1.1, DH-1.2, DH-1.3 for specific annual objectives under the category that corresponds with availability/accessibility of affordable housing.

Sources of Funding: Identify the sources of funding that will be used to achieve the stated specific objective during the program year.

Specific Annual Objectives: Identify the specific, measurable annual objective that corresponds with the specific objectives in the strategic plan under each outcome/objective category. List specific annual objectives that are supported by the use of CPD formula grant funds separate from those that are not supported by the use of CPD formula grant funds. Each specific annual objective developed to address a priority need, must be identified by number and contain proposed accomplishments and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction.

Performance Indicator: Enter the performance indicator that most closely describes the type of accomplishment and the most appropriate measure of that accomplishment. The performance indicator should be a reasonable projection of what will be accomplished during the program year. Jurisdictions are encouraged to use specific outcome indicators contained in the Federal Register Outcome Performance Measurement Notice, dated March 7, 2006.

Expected Number: Enter the annual number of the item indicated under Performance Indicator that the jurisdiction expects to accomplish during the annual program year.

Actual Number: Enter the annual number of the item indicated under Performance Indicator that the jurisdiction actually accomplished at the end of the annual program year. (This is for performance reporting purposes.)

Outcome/Objective: Identify the outcome/objective category in the following manner:

	Availability/Accessibility	Affordability	Sustainability
Decent Housing	DH-1	DH-2	DH-3
Suitable Living Environment	SL-1	SL-2	SL-3
Economic Opportunity	EO-1	EO-2	EO-3

Table 3B Annual Affordable Housing Goals

Resources used during the period: Enter a "X" in the cells that correspond with the source or sources of formula grant funds made available to the jurisdiction that were used for the various categories of households and the acquisition of existing units, production of new units, rehabilitation of existing units, rental assistance, and homeownership assistance, and other activities as appropriate during the period of time designated in the action plan portion of this document.

Annual Affordable Housing Goals (Sec. 215)

Homeless Households: Enter the total number of homeless households to whom the jurisdiction will provide affordable housing meeting the Section 215 criteria during the period of time designated in the action plan portion of this document.

Non-Homeless Households: Enter the total number of non-homeless households to whom the jurisdiction will provide affordable housing meeting the Section 215 criteria during the period of time designated in the action plan portion of this document.

Special Needs Households: Enter the total number of special needs households to whom the jurisdiction will provide affordable housing meeting the Section 215 criteria during the period of time designated in the action plan portion of this document.

Annual Affordable Rental Housing Goals (Sec. 215)

Enter the expected number of renter households the jurisdiction hopes to serve by the acquisition of existing units, production of new units, rehabilitation of existing units, and rental assistance during the period of time designated in the action plan portion of this document with funds made available by HUD to the jurisdiction.

Total Section 215 Affordable Renter: Enter the total number of renter households to whom the jurisdiction will provide affordable rental housing meeting the Section 215 criteria during the

period designated in the action plan portion of this document using funds made available to the jurisdiction.

Annual Affordable Owner Housing Goals (Sec. 215)

Enter the expected number of owner households the jurisdiction hopes to serve by the acquisition of existing units, production of new units, rehabilitation of existing units, and homebuyer assistance during the period of time designated in the action plan portion of this document with funds made available by HUD to the jurisdiction.

Total Sec. 215 Affordable Owner: Enter the total number of owner households to whom the jurisdiction will provide affordable homeownership housing meeting the Section 215 criteria during the period of time designated in the action plan portion of this document using funds made available to the jurisdiction.

Annual Affordable Housing Goals (Sec. 215)

Enter the expected number of households the jurisdiction hopes to serve by the acquisition of existing units, production of new units, rehabilitation of existing units, rental assistance and homebuyer assistance during the period of time designated in the action plan portion of this document with funds made available by HUD to the jurisdiction.

Total Section 215 Affordable Housing: Enter the total number of households to whom the jurisdiction will provide affordable housing meeting the Section 215 criteria during the period of time designated in the action portion of this document using funds made available to the jurisdiction.

Annual Housing Goals

Total Annual Rental Housing Goal: Enter the total number of rental households to be assisted with completed housing units that are considered affordable (using local definitions of affordability) during the period of time designated in the action plan portion of this document.

Total Annual Owner Housing Goal: Enter the total number of owner households to be assisted with completed housing units that are considered affordable (using local definitions of affordability) during the period of time designated in the action plan portion of this document.

Total Annual Housing Goal: Enter the total number of households to be assisted with completed housing units that are considered affordable (using local definitions of affordability) during the period of time designated in the action plan portion of this document.

Table 3C Action Plan Projects Table

General Instructions:

This portion of the table is to be used to enter information on projects or activities that will be carried out during the program year with grant funds made available for program year XXXX and, if applicable, funds made available from prior year funds.

Project Title: Enter the name of the project or activity.

Priority Need Category: Enter the priority need category that most nearly describes what you will do with available funds. The grantees selects it's identified need from a list of priority need categories. The priority need categories are: Homeless/HIV/AIDS, Non-homeless Special Needs, Rental Housing, Owner Occupied Housing, Public Facilities, Infrastructure, Economic Development, Public Services, Planning/Administration, and Other.

Specific Objective #: The grantee should identify the specific annual objective number identified in Table 3B.

Descriptions: Enter information is necessary to describe the proposed project or activity pursuant to 24 CFR 91.220 (d), including the priority need that will be addressed and the number and type of families that will benefit from the proposed activity. For CDBG activities, the description should include sufficient detail, including location, to permit a clear understanding of the nature and eligibility of the activity and to allow citizens to determine the degree to which they may be affected. For example, housing activities should include the number and type families that will benefit from the proposed activity and whether the assistance is for owner-occupied, rental, or publicly owned units.

Objective Category: Identify the general objective category in accordance with the Federal Register Notice dated March 7, 2006 issued by HUD.

<u>Outcome Category:</u> Identify the general outcome category in accordance with the Federal Register Notice dated March 7, 2006 issued by HUD.

Location and Target Area: There are five possible formats for this section (Address, Community Wide, CT & BG, N/A, Suppressed). This information indicates where an activity will occur. If the activity is located in a target area, also identify the name of the target area and the census tract(s) for the entire target area.

Project ID: The value of this variable uniquely identifies each and every project you enter.

Local ID: This is an optional alpha-numeric field. You may use it to enter a activity code of up to 18 characters that has some local significance. No two activities may share the exact same code.

HUD Matrix Code: Enter the code that most nearly describes what you will do with the funds. Only one matrix code may be used for an activity.

Funding: This section describes the amount of Federal and non-Federal resources that will be used to address needs identified in the plan.

<u>Community Development (CDBG)</u>: Enter the amount of CDBG funds that will be used for activities that will take place during the program year. Include any program income and Sec. 108 loan funds in the amount.

Homeless (ESG): Enter the amount of Emergency Shelter Grant funds that will be used for activities that will take place during the program year.

Housing (HOME): Enter the amount of HOME funds that will be used for activities that will take place during the program year.

HIV/AIDS (HOPWA): Enter the amount of Housing Opportunities for Persons with AIDS program funds will be used for activities that will take place during the program year within the eligible metropolitan statistical area.

Total CPD Formula Funds: This is the total amount of CPD formula funds that will be used to address needs identified in the plan.

Prior Year Formula Funds: Identify amount of prior year CPD formula funds that will be used during the program year to address needs identified in the plan.

<u>Assisted Housing:</u> Identify the amount of Assisted Housing program funds that will be used during the program year to address needs identified in the plan.

PHA (**Public Housing Agency**): Identify the amount of public housing agency program funds that will be used during the program year to address needs identified in the plan.

Other Funding: Identify amount of funding from other HUD or non-HUD sources that will be used during the program year to address needs identified in the plan.

Total: This is the total amount of funds that will be used to address needs identified in the plan.

Project Details:

CDBG Citation: Enter the CDBG regulatory citation based upon the matrix code that you selected.

CDBG National Objective: Use this field only if you enter an amount greater than zero for CDBG \$. You should indicate the National Objective for the CDBG program that this activity

will meet.

Type of Recipient: Indicate the type of recipient that will be administering the activity.

Performance Indicator: Enter the performance indicator that most closely describes the type of accomplishment and the most appropriate measure of that accomplishment. The performance should be a reasonable projection of what will be accomplished within the program year.

Annual Units: Enter the total number of the item you have indicated under Performance Indicator that you expect will be accomplished during the program year.

<u>Units Upon Completion:</u> Enter the total number of the item you have indicated under Performance Indicator that you expect will be accomplished after all funds have been spent.

Starting Date: Enter the projected starting date for the activity.

End Date: Enter the projected completion date for the activity.

Project's Primary Purpose: Indicate whether the activity's primary purpose to help the homeless; help persons with HIV/AIDS; help persons with disabilities; address needs of public housing.

Table 4 Priority Public Housing Needs

General Information

This section contains an optional table for describing priority needs of public housing. You should identify all priority public housing restoration and revitalization needs that your community either currently has or will have over the period of time designated in the strategic plan component of this document. This should reflect the results of the citizen participation process and the required consultation with public housing agencies that are located in your jurisdiction.

Priority Need Level Column: Choose the priority for allocating investment to each category of the housing need (if any). Designation of the relative priority is optional. If the following definitions of "high", "medium", and "low" priority are not used, please describe the manner in which the priorities for allocating investment are identified. For example, you can indicate a priority for allocating investments with a check mark, a "Y" for "Yes", a "N" for "No".

High Priority: The public housing agency or the jurisdiction plan to address this need with Federal funds, either alone or in conjunction with the investment of other public or private funds during the period designated in the strategy portion of this document.

Medium Priority: If funds are available, the public housing agency or jurisdiction may address this need with Federal funds, either alone or in conjunction with the investment

of other public or private sector funds during the period of time designated in the strategy portion of this document. Also, the locality will take other actions to help this group locate other sources of funds.

Low Priority: The public housing agency or jurisdiction do not plan to use Federal funds, either alone or in conjunction with the investment of other public or private resources for activities that address this need during the period of time designated in the strategy portion of this document. The jurisdiction will consider certifications of consistency for other entities' applications for Federal assistance.

No Such Need: The public housing agency or jurisdiction finds this is not a priority need or this need is already substantially addressed.

Estimated Dollars to Address: Enter the estimated expenditure needed (in current dollars) to address the priority public housing needs the locality either currently has or will have over the period of time designated in the strategic plan component of this document. Include all funds (Federal and non-Federal) that would be needed to address the priority needs.

Attachment Neighborhood Revitalization Strategy Areas

A jurisdiction that elects to develop a neighborhood revitalization strategy that includes the economic empowerment of low- and moderate-income persons may, upon HUD approval of the strategy, obtain greater flexibility in the use of CDBG funds in the revitalization area(s). These incentives are as follows:

- (1) **Job Creation/Retention as Low/Mod Area Benefit:** Job creation/retention activities undertaken pursuant to the strategy may be qualified as meeting area benefit requirements, thus eliminating the need for a business to track the income of persons that take, or are considered for, such jobs (24 CFR 570.208(a)(1)(vii) and (d)(5)(i));
- (2) **Aggregation of Housing Units**: Housing units assisted pursuant to the strategy may be considered to be part of a single structure for purposes of applying the low- and moderate-income national objective criteria, thus providing greater flexibility to carry out housing programs that revitalize a neighborhood (24 CFR 570.208(a)(3) and (d)(5)(ii));
- (3) **Aggregate Public Benefit Standard Exemption:** Economic development activities carried out under the strategy may, at the grantee's option, be exempt from the aggregate public benefit standards, thus increasing a grantee's flexibility for program design as well as reducing its record-keeping requirements (24 CFR 570.209(b)(2)(v)(L) and (M)); and,
- (4) **Public Service Cap Exemption:** Public services carried out pursuant to the strategy by a Community-Based Development Organization will be exempt from the public service cap (24 CFR 570.204(b)(2)(ii)).

In developing a neighborhood revitalization strategy, localities should consider that HUD will approve the strategy for this purpose only if it meets the following criteria:

- (1) **Boundaries:** The grantee has identified the neighborhood's boundaries for which the strategy applies. All areas within those boundaries must be contiguous.
- (2) **Demographic Criteria**: The designated area must be primarily residential and contain a percentage of low- and moderate-income residents that is equal to the "upper quartile percentage" (as computed by HUD pursuant to 24 CFR 570.208(a)(1)(ii)) or 70 percent, whichever is less, but not less than 51 percent)
- (3) **Consultation:** The strategy must be developed in consultation with the area's stakeholders, including residents, owners/operators of businesses and financial institutions, non-profit organizations, and community groups that are in or serve the neighborhood;
- (4) **Assessment:** The strategy must include an assessment of the economic situation in the area and an examination of economic development improvement opportunities and the problems likely to be encountered;
- (5) **Economic Empowerment**: There must be a realistic development strategy and implementation plan to promote the area's economic progress focusing on activities to create meaningful jobs for the unemployed and low- and moderate-income residents of the area (including jobs created by HUD-assisted efforts) as well as activities to promote the substantial revitalization of the neighborhood; and
- (6) **Performance Measurement:** The strategy must identify the results (e.g. physical improvements, social initiatives, economic empowerment, increases in homeownership and property values) expected to be achieved, expressing them in terms of outputs and outcomes that are readily measurable. This will be in the form of "benchmarks."

Since the grantee's HUD CPD Field Office representative will review the neighborhood strategy submission, the grantee should consult with its HUD representative to discuss what existing documents and information the grantee will be relying on for its submission and what information HUD will need to make this approval. Approval of the jurisdiction's Consolidated Plan does not imply approval of a neighborhood revitalization strategy proposal. HUD approval of any such strategy will be issued separately.